Atlantic Shores Offshore Wind North Project
Environmental Impact Statement Scoping Report

July 2024

U.S. Department of the Interior
Bureau of Ocean Energy Management
Office of Renewable Energy Programs

Table of Contents

List of Tables

List of Appendices

List of Abbreviations and Acronyms

Atlantic Shores	Atlantic Shores Offshore Wind, LLC
BOEM	Bureau of Ocean Energy Management
CFR	Code of Federal Regulations
COP	Construction and Operations Plan
DMA	Dynamic Management Area
ECC	export cable corridor
EFH	Essential Fish Habitat
EIS	environmental impact statement
EMF	electromagnetic field
ESA	Endangered Species Act
GHG	greenhouse gas
HAPC	Habitat Area of Particular Concern
HVAC	high voltage alternating current
HVDC	high voltage direct current
met	meteorological
metocean	meteorological and oceanographic
MMPA	Marine Mammal Protection Act
NARW	North Atlantic right whale
NEPA	National Environmental Policy Act
NMFS	National Marine Fisheries Service
NOAA	National Oceanic and Atmospheric Administration
NOI	Notice of Intent
OCS	Outer Continental Shelf
OREC	offshore wind renewable energy certificate
OSS	offshore substation
OSW	offshore wind
PAM	passive acoustic monitoring
PDE	project design envelope
PDF	portable document format
POI	point of interconnection
PPA	power purchase agreement
Project	Atlantic Shores Offshore Wind North Project
PSO	protected species observer
SF_6	sulfur hexafluoride
SMA	Seasonal Management Area
USC	U.S. Code
USCG	U.S. Coast Guard
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
WTG	wind turbine generator

1. Introduction

Council on Environmental Quality regulations for implementing the National Environmental Policy Act (NEPA) under Title 40 of the Code of Federal Regulations (CFR), Section 1501.9 require agencies such as the Bureau of Ocean Energy Management (BOEM) to perform certain actions as part of the scoping process, including the following:

- Determining the scope and the significant issues to be analyzed in depth in the environmental impact statement (EIS); and
- Identifying and eliminating from detailed study the issues that are not significant.

This document, in combination with the Draft EIS, is intended to satisfy BOEM's obligations under 40 CFR Section 1501.9.

On April 29, 2022, Atlantic Shores Offshore Wind, LLC (Atlantic Shores), submitted a Construction and Operations Plan (COP) for the Atlantic Shores Offshore Wind North Project (Project) to BOEM seeking approval to construct and operate a wind energy facility offshore New Jersey with two export cable corridors (ECCs) proposed. The Monmouth ECC would make landfall in Sea Girt, New Jersey. The Northern ECC may split, making landfall in the New York City area, or in the Asbury Park, New Jersey area. Multiple onshore interconnection cable routes have been identified from the landing sites to five proposed points of interconnection (POIs). The proposed POIs are the Larrabee and Atlantic substations in Monmouth County, New Jersey; Fresh Kills and Goethals substations in Richmond County, New York; and Gowanus substation in Kings County, New York. Atlantic Shores is actively seeking one or more offshore wind renewable energy certificate (OREC) or power purchase agreement (PPA) awards for this Project. Atlantic Shores' goal is to develop a commercial-scale offshore wind (OSW) energy facility in the Lease Area (OCS-A 0549) to provide renewable energy to the State of New Jersey, State of New York, or both. Atlantic Shores proposes to construct up to 157 wind turbine generators (WTG) in a 1.1 x 0.7 mile (1 x 0.6 nautical mile) grid distributed across the Lease Area. Up to eight small, four medium, or three large offshore substations (OSSs) are proposed within identified rows of structures. There may also be one permanent meteorological (met) tower constructed and up to two temporary meteorological and oceanographic (metocean) buoys installed during construction. Together, the WTGs, OSSs, and met tower and metocean buoys consist of up to 168 offshore structures (Proposed Action). After revision of the initial COP and receipt of supplemental filings, BOEM determined Atlantic Shores Offshore Wind North's COP to be sufficient in March 2024.

On March 15, 2024, BOEM issued a Notice of Intent (NOI) to prepare an EIS consistent with NEPA (42 U.S. Code [USC] 4321 et seq.) to assess the potential impacts of the Proposed Action and alternatives (88 *Federal Register* 42386). The NOI commenced a public scoping process for identifying issues and potential alternatives for consideration in the EIS. The formal scoping period was from March 15 through May 2, 2024. During the comment period, federal agencies, Tribal Nations, state and local governments, and the general public had the opportunity to help BOEM identify potentially significant resources and issues, impact-producing factors, reasonable alternatives (e.g., size, geographic, seasonal, or other restrictions on construction and siting of facilities and activities), and potential mitigation measures to analyze in the EIS, as well as provide additional information. BOEM also used the NEPA scoping process to initiate the Section 106 consultation process under the National Historic Preservation Act (54 USC 300101 et seq.), as permitted by 36 CFR Section 800.2(d)(3), which requires federal agencies to assess the effects of projects on historic properties. Additionally, BOEM informed its Section 106 consultation by seeking public comment and input through the NOI regarding the identification of historic properties

or potential effects on historic properties from activities associated with approval of the Atlantic Shores Offshore Wind North COP. BOEM also invites federally recognized Tribes to engage in government-to-government consultation throughout the NEPA process.

The NOI requested comments from the public in written form, delivered by mail, or through the Regulations.gov web portal. The public could also provide verbal or written comments at three in-person meetings or provide verbal comments at two virtual scoping meetings hosted by BOEM (Table 3-1).

2. Objective

The objective of this report is to identify substantive public scoping comments for consideration in the development of the EIS and categorize them based on the applicable resource areas or NEPA topics. Section 3, *Methodology*, describes the methodology used to identify and categorize comments. This categorization scheme allows subject matter experts responsible for preparing the EIS to review comments directly related to their areas of expertise and view the number of comments received by topic.

3. Methodology

3.1 Terminology

The following terminology is used throughout this scoping report.

- **Submission.** A submission is the entire content submitted by a single person or group at a single time. For example, a written or typed letter from an individual, an email with a portable document format (PDF) attachment, or a transcript of a verbal comment provided at a public scoping meeting are each considered to be a submission.
- **Comment.** A comment is a specific statement within a submission that expresses the individual's specific point of view, concern, question, or suggestion. One submission may contain multiple comments.

3.2 Comment Submittal

BOEM received comment submissions during the scoping process via the following mechanisms:

- Electronic submissions received via Regulations.gov on docket number BOEM-2024-0008;
- Electronic submissions received via email to a BOEM representative;
- Hard-copy submissions received by mail to BOEM; and
- Verbal or written comments provided at public scoping meetings.

3.3 Public Scoping Meetings

Table 3-1 lists the public meetings hosted by BOEM during the scoping period and the estimated number of attendees.

Table 3-1 Public Scoping Meetings

Meeting Date	Meeting Type and Location	Time	Estimated Number of Attendees
April 3, 2024	Virtual: Zoom Webinar	1:00 p.m. Eastern Time	179
April 9, 2024	In person: The Berkeley Hotel, Asbury Park, New Jersey	5:00 p.m. Eastern Time	75
April 10, 2024	In person: Grand Oaks Country Club, Staten Island, New York	5:00 p.m. Eastern Time	10
April 11, 2024	In person: Dyker Beach Golf Course, Brooklyn, New York	5:00 p.m. Eastern Time	12
April 16, 2024	Virtual: Zoom Webinar	5:00 p.m. Eastern Time	123

Each public scoping meeting featured presentations by BOEM providing an overview of the wind energy leasing history offshore New Jersey and New York and the NEPA process. The public scoping meetings also had presentations from Atlantic Shores with an overview of the Atlantic Shores North Project and the New Jersey Board of Public Utilities and the New Jersey Department of Environmental Protection explaining their respective roles in OSW development in New Jersey. During the virtual meetings, presentations were followed by a verbal public comment session, then a question-and-answer session. During the in-person meetings, the presentation was followed by an open house, where attendees could ask questions of BOEM subject matter experts and submit written comments or provide verbal comments to a court reporter. BOEM's virtual public meeting room for the Atlantic Shores North NOI (https://www.boem.gov/atlantic-shores-north-noi-eis-web-virtual-meeting-room) contains digital copies of the printed materials on display at the in-person meetings and recordings of the virtual public meetings. Atlantic Shores had staff available to answer questions from the public about the Project. Information was provided in both English and Spanish.

3.4 Comment Processing

3.4.1 Compilation of Submissions

BOEM's process for analyzing public comments involved using ICF's commercial web-based CommentWorks® software product. Submissions were received via Regulations.gov, mail, email, or delivered verbally or in writing at the public meetings (Table 4-1). All submissions were downloaded, processed, and imported into CommentWorks. CommentWorks served as the submission database and recorded information about each submission, including the submitter's name, submission date, submission method, and whether the submitter identified as a representative of an organization, or from a government entity or agency.

As submissions were entered into CommentWorks, they were assigned a temporary submission identification (ID), later replaced by a final submission ID that matches comments posted to Regulations.gov. The final submission IDs are listed in Appendix A, *List of Submissions and Individual Comments by Topic*.

Duplicate submissions from the same individual or duplicate submissions received via different delivery methods (e.g., submitted via Regulations.gov and emailed to a BOEM representative) were counted as a single submission.

Form letters are submissions that contain the same or similar text submitted by multiple individuals through an organized campaign. Each copy of a form letter was counted as a single submission.

3.4.2 Bracketing of Comments

All submissions were read in full to bracket and code individual comments, as defined in Section 3.1, *Terminology*. A hierarchical outline was developed to include key issues addressed by the commenters or identified in the NOI. This issue outline was used to code each individual comment within CommentWorks to a specific topic. Each comment coded received a unique comment ID number. For example, the first comment identified in submission BOEM-2024-0008-0002 was identified as comment BOEM-2024-0008-0002-0001. When a comment pertained equally to more than one topic, it was not coded to multiple topics but instead coded to the most applicable topic. The topics are listed in Table 4-2.

Appendix A, *List of Submissions and Individual Comments by Topic*, lists all of the submissions received, as well as all of the individual comments that were extracted from each submission, organized by topic. The individual comments provided in Appendix A include verbatim comment excerpts as written by the commenters. The purpose of presenting this material in its verbatim form is to preserve the exact words of the commenter as they relate to each issue. However, formatting may differ from the original submission as a result of the conversions needed to enter submissions into CommentWorks software in a consistent format for processing. Comment submissions can be viewed in their original format with any associated attachments by browsing comments posted at https://www.regulations.gov/docket/BOEM-2024-0008.

3.4.3 Classification of Comments

Substantive comments are those requiring further consideration due to the potential for actionable implications on the NEPA process or EIS. Comments considered substantive and bracketed for purposes of BOEM's public scoping effort include comments that identified:

- Significant issues to be analyzed in the EIS;
- Sources of information to include in the EIS;
- Data gaps and information needs;
- Potential effects that the Proposed Action could have on biological resources, physical resources, socioeconomic and cultural resources;
- Other reasonable alternatives to the Proposed Action that BOEM should consider, including additional or alternative avoidance, minimization, and mitigation measures; and/or
- Identification of historic properties, potential effects on historic properties, and measures to avoid, minimize, or mitigate adverse effects on historic properties.

Comments expressing general support for or opposition to BOEM's OSW program or the Atlantic Shores North Project but lacking specific or substantive supporting rationale were also bracketed, but not considered substantive. The same non-substantive coding was applied to comments addressing multiple topics in a generalized, non-actionable manner. General themes expressed in non-substantive comments are summarized in Section 5.27, *General Support or Opposition, or Multiple Topics Discussed Generally*. Although BOEM reviews all comments received, only those comments determined to be unique and substantive are carried on for further consideration in developing the EIS. As such, BOEM does not tally comments received in support or opposition to a given project, nor consider the relative frequencies of such comments as an influencing factor in the decision-making process.

Text not related to the Proposed Action, alternatives, connected actions, reasonably foreseeable impacts, or cumulative actions, as well as background information not directly related to or providing essential context for a substantive comment, was considered to be not germane. Text determined not to be germane was not bracketed, coded, or included in Appendix A, *List of Submissions and Individual Comments by Topic*.

Only a single copy of each form letter (referred to as the "form letter master") and letters containing additional unique, substantive text (referred to as "form letter plus"), were bracketed and coded.

4. Distribution of Submissions and Comments

4.1 Submissions

BOEM received 1,240 submissions from the public, government agencies and elected officials, and other interested organizations. Table 4-1 shows the number of submissions received via each delivery method. Comments received via multiple delivery methods were only counted once.

Table 4-1 Number of Submissions by Delivery Method

Delivery Method	Number of Submissions Received
Regulations.gov	1,132
Email to BOEM representative	13
Verbal comment transcribed by court reporter at virtual or in-person public meeting	89
Written comment submitted at in-person public meeting	6
Mail	0
Total[1]	**1,240**

[1] Includes 525 identical or substantially similar copies of a form letter.

BOEM received 1,240 total submissions from the following entities.

- 5 submissions from federal agencies: The National Marine Fisheries Service (NMFS), National Park Service, U.S. Environmental Protection Agency (USEPA), U.S. Fish and Wildlife Service (USFWS), and the Mid-Atlantic and New England Fishery Management Councils.
- 4 submissions from state agencies: New Jersey Department of Environmental Protection, New Bedford Port Authority, New York State[1], and the New Jersey State Chamber of Commerce.
- 1 submission from state or local elected officials: Senator Carmen F. Amato Jr., Assemblyman Brian E. Rumpf, and Assemblyman Gregory E. Myhre representing New Jersey's 9th Legislative District
- 12 submissions from a local government: Cape May County, Borough of Sea Girt, Long Beach Township, Borough of Lavalette, and Berkeley Township.

[1] The New York State Departments of Environmental Conservation and New York State Department of State, in consultation with the Office of Parks, Recreation, and Historic Preservation; Office of General Services; and Department of Public Service.

- 41 submissions from non-governmental or quasi-governmental organizations, or individuals identifying as affiliated with such organizations.
- 8 submissions from businesses or trade associations.
- 2 submissions from industry representatives.
- 1 submission from academia.
- 1,045 submissions from individuals.
- 121 submissions from anonymous individuals.

BOEM received multiple submissions associated with four form letter campaigns expressing support for the Atlantic Shores North Project. This included approximately 11 identical or substantially similar copies of the form letter master (BOEM-2024-0008-DRAFT-0347), 33 identical or substantially similar copies of form letter master (BOEM-2024-0008-DRAFT-0111), 1 identical or substantially similar copies of form letter master (BOEM-2024-0008-DRAFT-0090) and 467 identical or substantially similar copies of form letter master (BOEM-2024-0008-0346).

4.2 Comments

BOEM identified a total of 1,936 unique comments, of which 860 were deemed substantive. Table 4-2 shows the distribution of comments coded to each topic. The most commonly addressed topics included alternatives, mitigation and monitoring, marine mammals, NEPA and the public involvement process, and demographics, employment, and economics.

Table 4-2 Distribution of Comments by Resource or NEPA Topic

Topic	Number of Comments
Air Quality and Climate Change	49
Alternatives (Wind Turbines, Cables and Landfalls, Project Relocation, Other Comments on Alternatives)	113
Bats	9
Benthic Resources	16
Birds	45
Coastal Habitat and Fauna	7
Commercial Fisheries and For-Hire Recreational Fishing	85
Cultural, Historical, and Archaeological Resources	24
Demographics, Employment, and Economics	148
Environmental Justice	21
Finfish, Invertebrates, and Essential Fish Habitat	33
Land Use and Coastal Infrastructure (Onshore Noise and Vibration, Materials Management)	50
Marine Mammals	153
Mitigation and Monitoring	126
Navigation and Vessel Traffic	22
NEPA/Public Involvement Process	148

Topic	Number of Comments
Other Resource Uses (Aviation, Marine Minerals, Military, Research Activities, Other)	53
Other Topics Not Listed (Coastal Zone Consistency, Offshore Noise, Electromagnetic Fields)	57
Planned Activities Scenario/Cumulative Impacts	25
Proposed Action/Project Design Envelope	53
Purpose and Need	27
Recreation and Tourism	50
Sea Turtles	5
Scenic and Visual Resources	67
Water Quality	22
Wetlands and Waters of the United States	3
General Support or Opposition, or Multiple Topics Discussed Generally	525
Total	**1,936**

5. Comment Summaries by Topic

The following sections summarize the key points of comments coded to each topic. Comments are summarized, as appropriate, based on concerns that were raised by several commenters and interpreted for clarity and conciseness. BOEM's interpretation and summarization of scoping comments does not constitute agreement or disagreement with the content of the scoping comments. The purpose of this report is to present the issues, questions, and concerns raised in the scoping comments for consideration during the NEPA process. Additionally, because each comment was coded to only one category, but may express concerns related to multiple categories, the comment summaries below attempt to capture comments coded to each category as well as related comments that may have been coded to different categories.

Appendix A, *List of Submissions and Individual Comments by Topic*, presents the full text of each coded comment ordered by topic. The comment excerpts that only expressed general support or opposition are not included in Appendix A in their verbatim form. Instead, those comments are summarized here in Section 5.27, *General Support or Opposition, or Multiple Topics Discussed Generally*.

5.1 Air Quality and Climate Change

Air quality comments included evaluating emissions from the proposed Project relative to permitting and regulatory requirements. Topics raised in this category included the following:

- Multiple commenters noted that the EIS should consider the air quality impacts anticipated during construction and the smaller and more infrequent impacts anticipated from decommissioning.
- Multiple commenters specifically expressed concerns about sulfur hexaflouride (SF_6) and the need to disclose all quantities involved during each Project stage. This includes both general usage in all Project infrastructure and fugitive emissions or leakage. One commenter highlighted the need to account for unreported SF_6 leakage.

- Multiple commenters stated the Project's potential to reduce greenhouse gas (GHG) emissions and associated contributions to climate change when compared to fossil-fuel-based energy sources and requested that the EIS quantify these reductions.
- Commenters stated that the effects of climate change, such as sea level rise and higher ocean temperatures, greatly outweigh environmental costs of the Project.
- Commenters expressed concerns that the Project could indirectly alter atmospheric conditions and aquatic habitats which, in turn, would disturb natural oceanic carbon sequestration processes.
- Commenters expressed concern over the viability of structures to withstand wave action and wind speeds during a hurricane.

5.2 Alternatives

Alternative comments included suggesting, questioning, or providing opinions about alternatives to the proposed Project. Additional comments related to alternatives and the Project's design are included in Section 5.20, *Proposed Action/Project Design Envelope*. Topics raised in this category included the following:

5.2.1 Wind Turbines

- Many commenters stated the EIS should consider reducing the size and number of turbines and substations.

5.2.2 Cables and Landfalls

- Many commenters stated that cable burial depths need to be as deep as possible; specific depth suggestions differ by commenter.
- Commenters recommended the EIS include a full range of reasonable alternatives to the proposed offshore and onshore ECCs and landing site options should also be considered and evaluated to avoid and minimize impacts on sensitive habitats in the Project area.
- Many commenters stated the EIS should consider alternatives related to the methods of construction and cable routes that avoid sensitive habitats and reduce habitat impacts and potential interactions with fishing gear and prime fishing habitat.

5.2.3 Project Relocation

- Many commenters stated the proposed Project should be further offshore, with a range of distances suggested from 20 miles or more.
- Commenters stated that the Project should adopt consistent exclusion zones, similar to those offshore of other states such as New York and Massachusetts.

5.2.4 Other Comments on Alternatives

- The EIS should consider and evaluate the full range of reasonable alternatives to the proposed Project, including those that would cause less damage to the environment.
- The EIS should consider alternatives to using monopiles and consider construction alternatives to avoid the use of pile driving. Gravity-based foundations and suction bucket foundations should be included for the proposed Project.

- The EIS should include quiet foundation technology.
- BOEM should individually evaluate each foundation technology identified as viable by the Project's applicant as a reasonable alternative in the EIS, and the best alternative should be selected as the preferred alternative.
- The alternatives should ensure decommissioning that makes developers explicitly responsible for removing equipment when the Project ends.
- Commenters expressed concern that the reliability of OSW power has not been demonstrated in the U.S. for the proposed Project's size. Commenters urge BOEM to move more slowly.
- BOEM should consider an alternative that limits or avoids development in areas of the lease that may contain vulnerable and difficult to replace resources and may adversely affect complex bottom habitat, important benthic features (including ridge and swale complexes), and marine resources. USEPA noted that the Lease Area and cable routes intersect regions of relatively high seabed mobility, high seabed habitat vulnerability, and regions designated as sand borrow areas.
- USFWS suggested alternatives to reduce the likelihood of bird collision with turbines.
- NMFS recommended the relocation of proposed OSSs to coincide with an existing turbine foundation location to reduce navigation and safety impacts on vessels operating in the area.
- NMFS stated concern for the use of high voltage direct current (HVDC) converter stations, which use an open-loop cooling system, and recommended BOEM consider requiring the use of closed-loop cooling systems for offshore converter stations to reduce or eliminate adverse effects from impingement or entrainment.
- USEPA suggested that the EIS have a clear separation between the evaluation of the No Action Alternative and the cumulative effects analysis and a clear justification for the preferred alternative by compared the affected resource under each alternative.

5.3 Bats

Topics raised in this category included the following:

- Multiple commenters stated that the analysis in the COP is insufficient to draw conclusions about risks to bat species given the paucity of data in the region, lack of inclusion of relevant recent telemetry data, and uncertainties around bat behavior at OSW facilities.
- A commenter suggested the need for evaluation of northern long-eared bat activity year-round in the vicinity of the Proposed Action.
- Multiple commenters stated that little data exists on the interactions between bats and OSW facilities. A commenter recommended that BOEM consult with the U.S. Geological Survey Forest and Rangeland Ecosystem Science Center to make assumptions about total fatalities from turbines.

5.4 Benthic Resources

Comments regarding benthic resources included concerns over changes to habitat, lost benthic resources, and adequacy of benthic survey data. Benthic habitat refers to habitat on the sea floor, including natural structures and vegetation. Topics raised in this category included the following.

- Commenters expressed concern over the impacts the offshore components of the Project may have on benthic resources and asked BOEM to fully describe the anticipated geographic extent and recovery time for seafloor habitats that would be disturbed from construction of the Project, including the export and interarray cables. Commenters also asked that BOEM identify existing benthic, shellfish, and coral conditions in the affected environment.
- A commenter asked that the EIS disclose information on the current benthic habitat conditions as well as all known shipwrecks, artificial reefs, and derelict gear to support the COP's assertion that construction of the Project would not create measurable opportunities for the introduction of invasive species or the contamination of sediments.
- NMFS recommended that the EIS address impacts of construction activities (i.e., anchoring boulder relocation) on benthic habitats.
- USEPA recommended implementing a long-term monitoring plan to measure recovery of benthic habitat and to monitor for potentially invasive species. They suggested developing an action plan to address incomplete recovery or areas affected by invasive species.

5.5 Birds

Bird comments included concerns regarding collision risk, data-gathering methods, and monitoring. Topics raised in this category included the following.

- Commenters requested that the EIS consider the full range of potential impacts on all bird species known to forage, rest in, or migrate through or near the Project area, including those species protected under the Migratory Bird Treaty Act, the Endangered Species Act (ESA), and the Bald and Golden Eagle Protection Act, as well as species of birds covered under obligations for conservation of birds under the Fish and Wildlife Conservation Act as amended in 1988.
- A commenter requested that the EIS analyze the impact on piping plover migration and nesting grounds on Brigantine Beach.
- A commenter suggested coordinating with state and federal agencies on avian mitigation opportunities, including identification of opportunities to support conservation and habitat restoration or enhancement for protected avian species.
- Commenters expressed concern about effects on birds from increased frequency of fog/mist/cloud condition caused by WTG operations and by Project effects on diving bird foraging and bird migration flight altitude.
- A commenter suggested that bird avoidance of WTGs results in habitat loss and loss of efficient migratory routes and suggested estimating the cumulative area and magnitude of habitat loss, in addition to estimating the additional miles of species-specific migratory route and the associated energetic costs and reductions in survival.
- A commenter noted that avian turbine collisions in the marine environment are difficult to detect and that several factors influence bird presence within a given area, including the distribution of food resources (marine foragers), migration routes, and weather effects (passerines and shorebirds). Relying on the current system of estimating the collision potential for each species or guild evaluated by bird density and abundance data is inappropriate because the collision risk models are sensitive to input parameters such as estimated abundance or density of species and flight heights which often do not have high precision and accuracy.

- A commenter stated that detecting the population-level effects of collisions is difficult because bird species at risk of collision are often not linked to source populations, and that inferences about collision risks might be drawn from European studies.
- A commenter suggested addressing potential impacts on diving marine birds from subsurface acoustic disturbances and from sound pressure waves during construction and related operations and impacts on avian navigation from low-frequency sound (infrasound).
- A commenter suggested addressing the indirect effects on marine birds from post-construction redistribution of forage fish populations resulting from habitat loss and habitat replacement with vertical structures that act as artificial reefs and addressing secondary consequences for avian habitat use and energetics from the synergistic effects of ecosystem-scale alterations.
- A commenter stated that a North American and European literature review of bird reactions to wind farms indicates that displacement in offshore habitats is more prevalent than attraction and suggests that determination of effects will require a careful monitoring design.
- USFWS expressed concerns including federally listed, proposed, and candidate species pursuant to the ESA; The Edwin B. Forsythe National Wildlife Refuge; migratory birds pursuant to the Migratory Bird Treaty Act; and bald eagles pursuant to the Bald and Golden Eagle Protection Act.

5.6 Coastal Habitat and Fauna

Coastal habitat includes those areas closer to the shoreline than offshore waters. Topics raised in this category included the following:

- Commenters requested that BOEM evaluate impacts on coastal flora and fauna and use science-based measures to avoid, minimize, mitigate, and monitor impacts.

5.7 Commercial Fisheries and For-Hire Recreational Fishing

Fisheries comments discussed economic and social impacts on commercial fisheries, commercial fishing operations, and for-hire recreational fishing operators. Topics raised in this category included the following:

- Commenters requested that the EIS fully characterize the extent and value of commercial, for-hire, and charter fishing in the Project area, including a breakdown of the economic exposure of the proposed Project by state, port, gear type, and fishery. Additionally, commenters requested that the EIS evaluate commercial, for-hire recreational, and private recreational fishing separately but in the same or adjacent sections to illustrate potential impacts on all fishery sectors and describe how all impacts may vary by target species, gear type, fishing location, and type of fishing (commercial or recreational).
- A commenter requested that the EIS acknowledge that the benefits of any artificial reefs will have varying effects by target species and by fishing sector.
- Commenters requested that BOEM coordinate early and often with NMFS and state agency fisheries staff on the most appropriate data for analysis of potential impacts on fisheries, as well as cooperatively working with the state, fishing communities, and commercial, charter, and recreational interests.

- Commenters voiced safety concerns about commercial and recreational fishing vessels maneuvering, drifting, or anchoring near WTGs and OSSs and requested the EIS evaluate these safety considerations across different fisheries. Varying weather conditions and fishing gear should be considered when evaluating impacts on fisheries in the Lease Area. A commenter requested that BOEM utilize similar evaluations as past EISs in regard to impacts due to WTG spacing.
- A commenter expressed concern that the Project would affect the Mid-Atlantic Cold Pool and thus affect the fishing industry.
- A commenter noted that fishermen cannot easily relocate to different areas to avoid a wind farm without socioeconomic impacts.
- Commenters requested that BOEM accurately characterize the value of commercial fisheries landings in the Project area and not solely rely on financial metrics. Additional factors to consider include the number of affected fishery participants, the use of a low-value species as bait for a high-value species, or a seasonally important fishery.
- Commenters expressed concern about the impact of WTG noise in combination with other stressors on commercial fisheries and requested discussion of this impact in the EIS.
- Commenters expressed concern related to the impacts of OSW-related surveys on commercially harvested fish and listed species. Commenters requested BOEM consider the impacts on all harvested species within and surrounding the Lease Area.
- A commenter stated that the EIS should include the best scientific information to characterize fishing operations and evaluate impacts.
- Commenters requested that the EIS thoroughly evaluate both the biological and socioeconomic impacts of the Project on fishery resources, operations, and associated communities, and include alternatives that avoid and minimize impacts on such habitat.
- Commenters discussed the need for the EIS to outline mitigation measures to protect fisheries. This includes an assessment to account for loss in income and protecting fisheries that lack landing or revenue data, including the development of a mitigation fund to support regional monitoring of key commercial fish stocks. Additional commenters requested the development of a monitoring plan that would be described in the EIS to account for potential losses.
- Commenters requested that BOEM work with NMFS to ensure appropriate fishing and habitat data is used in the development of alternatives and in the evaluation of potential impacts.
- Commenters requested that the EIS assess the potential impacts on key species' distribution, abundance, and feeding in the Project area and its vicinity, including estimating the extent of fishable seafloor loss within cable corridors due to secondary cable protection and seafloor disturbance. Commenters requested that the EIS consider the decommissioning of cables and management of abandoned or unmonitored cables on commercial fisheries.
- NMFS stated the Project area overlaps with several New Jersey prime fishing areas and artificial reefs and requested economic and social impacts on these fisheries due to the Project be analyzed in the EIS.
- NMFS requested that the EIS describe all commercial and recreational (party/charter and private angler) fisheries that may be affected by the Project; historic and recent fishery landings revenue and effort; fishery effort and reliance upon operations in the Project area; shoreside support

services affected by the Project such as dealers, processors, distributors, and suppliers; and coastal communities dependent on fishing operations in the Project area.

- USEPA stated that the COP indicates important fisheries are in the Project area and recommends that the EIS analyze the potential for increased vessel strike, noise-related impacts due to pile driving and wind turbine operation, disruption or conversion of habitat, and displacement.

5.8 Cultural, Historical, and Archaeological Resources

Comments related to cultural, historical, and archaeological resources were mostly reminders to BOEM to coordinate and consult with the appropriate parties, as well as abide by the relevant laws and policies. Comments also stressed that there may be unidentified cultural resources in the Project area.

- Multiple commenters noted the need for BOEM to ensure that they are doing their due diligence to identify historical, archaeological, and cultural sites, including previously unidentified sites.
- Commenters stated that there may be significant unidentified sites and suggested that BOEM conduct professional surveys prior to selecting a preferred alternative.
- Many commenters noted that visual impacts from the Project that could affect the setting of historic properties would be irrelevant if the historic properties become damaged or inaccessible to the public due to climate change.
- Many commenters noted that BOEM should coordinate with Tribes, historic groups, indigenous groups, and state and private parties in order to fully evaluate impacts on resources and sites. They also noted a need for compliance with the National Historic Preservation Act, including the Section 110(f) process to assess adverse impacts on historic properties. USEPA recommended that Tribes be invited to participate in the development of an unanticipated discovery plan for offshore and onshore construction activities.
- Commenters provided historical background on areas and sites in the Project vicinity to note their importance.
- Commenters noted the need for BOEM to identify historic properties, including National Historic Landmarks, in the viewshed of the Project, to evaluate the effects from the Project on those properties; and to resolve any adverse effects through avoidance, minimization, and mitigation measures per Section 106 of the National Historic Preservation Act.

5.9 Demographics, Employment, and Economics

Topics raised in this category included the following:

- Multiple commenters stated concern with the private economic interests of the developer at the expense of waterfront communities in New Jersey.
- Multiple commenters emphasized the number of full-time jobs created by the Project, contributing to the Biden-Harris Administration's Justice 40 initiatives, including jobs that are direct, indirect, and induced, and requested that the EIS build on this information and include further specificity for each category.
- A commenter stated that all economic reports, including PPAs, should be readily available to the public.

- A commenter requested that positive and negative economic impacts of the manufacturing and supply chain facility, workforce development programs, and opportunities for marine workforce be part of the EIS analysis.
- A commenter requested that BOEM fully corroborate statements by developers regarding Project economics since the public cannot, as BOEM considers this information confidential.
- Commenters stated that the EIS should address the concern that using OSW energy would not be cost-effective for consumers and taxpayers, including residents and businesses. Commenters feared that electricity rates and prices would rise from using OSW and not be offset by any subsidies.
- Numerous comments were submitted regarding concerns that the Project's costs will be passed on to taxpayers and that wind energy is more expensive than other forms of energy, including nuclear.
- Some commenters noted general support for the Project and stated that the Project would not increase energy prices and would create a more diverse energy market in New Jersey based on clean energy.
- Commenters asked that the EIS clearly explain how the state's OREC system works, and present the levelized cost of electricity from the Project (with and without subsidies), expected annual revenues, and what proportion of that will be returned to ratepayers.
- Commenters felt that the proposed Project would bring numerous economic benefits to New Jersey, including investments in the long-term support of energy infrastructure.
- Commenters asked that BOEM perform an economic analysis of the Project independent of the Lessee to verify economic data.
- Commenters asked for additional research and guidance on how local business can collaborate and take advantage of wind tourism. They suggested that New Jersey continue to consult with community members and keep investing in research and regional collaboration.
- Commenters requested that the EIS consider the economic costs and benefits of the proposed Project, as well as all alternatives, similar to BOEM's cost benefit analyses for oil and gas activities, taking into consideration the economic implications of climate change. Specifics for BOEM to consider include the following:
    - Quantifiable and qualitative measures of costs and benefits that are difficult to quantify, but essential to consider (i.e., potential economic, environmental, public health and safety, distributive impacts, and equity).
    - Quantitative analysis of the costs of the Project to the fishing industry and affected communities (i.e., analyze reduced fishing revenue, catch rates, changes to species, spawning success, fishing culture, fisherman health and well-being).
    - The amount of federal, state, or local taxpayer subsidies devoted to the Project, projections of the full cost to ratepayers (including the contract price in addition to any predictions of Project contingencies or overages), and the portion of Project costs that would accrue to foreign markets.
    - Comparison of relative costs and environmental impacts of alternative technologies.

  - The OSW farm would diversify and strengthen the economies of coastal communities as well as provide new job opportunities, resulting in a beneficial economic impact. Commenters provided estimated numbers of dollars the proposed wind farm is expected to generate as well as potential job projections for construction, operations, and maintenance of the proposed turbines.
  - Other commenters were concerned that turbine manufacturing is performed overseas, and the main job growth opportunity for local communities will be short term during construction of the turbines. These commenters were concerned that long-term operation and maintenance of the turbines will be automated and therefore would limit the number of long-term job opportunities for local communities.

- Commenters also requested the following topics be analyzed, documented, or included in the EIS:
  - Impacts on housing and property values, population, economy, and employment.
  - Apprenticeship utilization, including the type of apprenticeship ensuring that they are union programs or Department of Labor certified, and the ratio of apprentice to journeyman jobs.
  - Allocation of funds by the developer for environmental and economic initiatives for the communities most affected, as well as commitments to port infrastructure for those dedicated to marshaling and operation and maintenance activities.
  - Workforce development needs, plans and collaborations associated with the Project.
  - Specification of job categories (for construction, operations, and maintenance) and job numbers per category resulting from each domestically manufactured component, as well as how these numbers are accounted for in the total number of direct, indirect, and induced jobs, gross state product, and personal income anticipated from the Project.
  - Education and certifications necessary to access each job category, the training, average wages, hours, career advancement, physical demands, and safety information, as well as any commitments the company has made to ensure workers have the free and fair choice to join a union, such as through a union neutrality agreement.
  - Jobs that require specialized experience that would prohibit workers in the U.S. from accessing those jobs, and the specific experience and training that is required.
  - Specification as to whether workers will need to go overseas to receive training, and the duration of that training.
  - Impacts of rising costs of materials and labor for OSW projects.

5.10 Environmental Justice

Comments pertaining to environmental justice included suggestions to assess adverse impacts on and benefits to these communities. Topics raised in this category included the following:

- Commenters asked BOEM to account for both the improved health effects the proposed Project would bring, as well as the health burdens of the No Action Alternative, when assessing the proposed Project. Commenters also requested that BOEM ensure the full scope of benefits to environmental justice communities are assessed in the EIS.
- Commenters requested that BOEM utilizes screening tools including those developed by USEPA, Council on Environmental Quality, and Centers for Disease Control and Prevention, to assist in

evaluating effects on communities with environmental justice concerns and include this data as part of its analysis in assessing the impacts of the proposed Project.

- A commenter stated that BOEM should consider the status of negotiations with labor unions and grassroots organizations based in environmental justice communities affected by OSW development when evaluating the proposed Project.
- A commenter stated that prior OSW development projects have had negative impacts on environmental justice populations and that BOEM should perform a cumulative analysis that includes these negative effects on populations.
- A commenter requested that the EIS address environmental justice effects specific to fishing communities with minority and low-income populations and coastal communities that include Tribal nations who utilize the ocean.
- Commenters asked what plans are in place to ensure the safety of local native communities.
- Commenters expressed that a robust environmental justice analysis be included in the EIS and the criteria BOEM used to perform the analysis be provided.
- Commenters stated that coastal and fishing communities often have large minority and low-income populations. The EIS should account for impacts on these communities and consider Executive Orders 12898, 13985, and 13175.
- Commenters stated that BOEM should analyze language access needs for local communities in the EIS to increase transparency and ensure the local community can access the benefits of the Project.

5.11 Finfish, Invertebrates, and Essential Fish Habitat

Topics raised in this category included the following:

- Commenters recommended using up-to-date Essential Fish Habitat (EFH) and Habitat Area of Particular Concern (HAPC) designations for impact analysis. Commenters noted that HAPC has been designated by the Mid-Atlantic Fishery Management Council for summer flounder, all native species of macroalgae, seagrasses, freshwater and tidal macrophytes, and loose aggregations and the importance of native species restoration. Commenters noted that the proposed cable route overlaps HAPC for summer flounder and complex habitats and other sensitive estuarine environments.
- Commenters recommended the use of the EFH mapper for spatial data for species managed by the New England, Mid-Atlantic, and South Atlantic Fishery Management Councils and for highly migratory species at https://www.habitat.noaa.gov/protection/efh/efhmapper/; the EFH Information Needs document; the NMFS Recommendations for Mapping Fish Habitat (March 2021); and the EFH Information Needs for Offshore Wind Energy Projects in the Atlantic.
- Commenters noted that EFH consultation should begin early in the EIS development process because adverse impacts on EFH may result from actions occurring within or outside of areas designated as EFH and that EFH assessments and consultations conducted in the later stages of other projects have failed to adequately assess the impacts of geological and geophysical surveys to the acoustic environment. Commenters requested that BOEM consult with the Mid-Atlantic Fishery Management Council, New England Fishery Management Council, and NMFS.

- A commenter identified mandatory elements for the Project's EFH assessment as required by 50 CFR Section 600.920(e)(3)), as well as expanded consultation requirements described in 50 CFR Section 600.920(f) on account of the potential for substantial adverse effects on EFH. The commenter also indicated that the assessment should follow the EFH Assessment Template for Offshore Wind Energy Projects.
- A commenter expressed concern for impacts on winter flounder, longfin squid with demersal eggs and during inshore migration (April to August), and disruption of social spawning behavior resulting in susceptibility of demersal eggs to abrasion and burial.
- Commenters expressed concern about cumulative effects of regional OSW development on prey resources and stated that these may be characterized as adverse effects under EFH regulations.
- Commenters requested that the EIS analyze Project-specific and cumulative effects on the physical and biological habitat features for benthic resources, fish, and invertebrate species, including benthic, demersal, bentho-pelagic, pelagic, emergent fauna, and epifaunal species and the biological consequences of those effects. The commenters recommended that the analysis include hydrodynamics and oceanographic and atmospheric conditions; current stock status for different species; migration routes; seasonal abundance and distribution; EFH including that designated under the Magnuson-Stevens Fisheries Conservation Act; spawning, recruitment, and nursery areas; forage species and food web interactions; impacts on all life stages (adults, juveniles, larvae, eggs) and focus on species and life stages that may be more vulnerable to impacts. They requested that mitigation measures be proposed and analyzed for impacts that are not feasible to avoid or minimize.
- Commenters requested the following topics be analyzed, documented, or included in the EIS:
    - The presence and potential impacts on Atlantic sea scallops and ocean quahogs and other commercial finfish and invertebrate species.
    - Identification and modeling of invasive species that may affect the quality and biodiversity of EFH.
    - Discussion of impacts on habitat alteration including conversion of smaller-grained hard habitats (e.g., pebbles, cobbles) that support early finfish life history stages to smaller-grained soft-sediment habitats and impacts from attraction of larger predator species to artificial substrates. Also consider increased opportunity for pathogen virulence evolution due to higher spatial density of fish surrounding artificial substrates.
    - Discussion of the habitat value and function of natural versus human-made reef structures.
    - Impacts on invertebrates from impairment of locomotion, mechanosensory reception, ability to clean feeding siphons.
    - Disclose potential impacts on benthic invertebrates such as the American lobster and the horseshoe and Jonah crabs and habitats such as submerged aquatic vegetation, natural hard bottom substrates, dense faunal beds, reefs, marshes, and others.
    - Alternatives to avoid EFH, HAPC, and deep-sea coral areas.
    - Impacts on the Mid-Atlantic Cold Pool and resulting effects on oceanographic processes, ecosystems, marine species life cycles, EFH, and the fishing industry. Commenters stressed that strong scientific understanding and supporting research of how the Project would alter abiotic factors such as changes to primary productivity, ocean stratification, distribution and

availability of prey species, ocean currents, and temperature stratification should be developed prior to moving forward with approval of the Project.

- Fully describe the distinct habitat features of the entire Project area and the importance of different habitat types for providing structure and refuge, as well as habitats important for eggs, larvae, and juveniles. The evaluation of the Project impacts should not only consider impacts of the Project against the cumulative geographic scope (e.g., the outer continental shelf), but also clearly evaluate anticipated impacts of Project construction and operation on the distinct habitat types found in the Lease Area, along the export cable route, and on inshore landfall/inland locations.
- Comprehensive regional fisheries and benthic resources monitoring plan as well as a Fisheries Habitat Impact Minimization alternative developed in collaboration with state fishery managers and scientists.

5.12 Land Use and Coastal Infrastructure

Land use and coastal infrastructure comments addressed potential land use conflicts. Topics raised in this category include the following:

- A commenter requested that the EIS provide an analysis of reduced wind and breeze at the shore from the extraction of the normal wind by the turbines. The commenter presented a study depicting decreased wind speed from turbines and requested BOEM conduct a study on this.

5.12.1 Onshore Noise and Vibration

Comments addressed the anthropogenic impacts of operational turbine noise. Topics raised in this category include the following:

- Commenters noted that the COP does not demonstrate the audible and infrasonic noise that could affect persons at the shore and noted operational noise could exceed the New Jersey nighttime residential standard of 50 decibels. Another commenter noted that there are potential human and animal health risks associated with sustained low-frequency noise from wind turbine operation.
- Multiple commenters stated that the EIS should provide a quantitative assessment of airborne noise levels at the shore for both turbine operation of the proposed Atlantic Shores North Project and the adjacent Atlantic Shores South Project.

5.12.2 Materials Management

Comments addressed the fate of materials and potential risks of materials/waste spills. Topics raised in this category included the following:

- A commenter noted that various stations and depots containing fuels and other maintenance equipment for wind farms are generally being built in residential areas. The commenter is concerned that the infrastructure takes up too much space, contributes to noise pollution, and may not be sufficiently prepared for hurricanes or other adverse weather.
- A commenter expressed concern that there is a need to develop comprehensive waste management plans and ensure that all of the Project personnel are trained to prevent spills and to control water pollution.

- Multiple commenters expressed concerns with the decommissioning stage of the Project due to difficulties and costs associated with transportation, blade recyclability, and disposal.
- Multiple commenters expressed concerns that the Project would increase demand for rare earth metals and minerals and therefore lead to increased mining of these materials globally, which can negatively affect ecosystems, water quality, health and safety, and the greater human environment. Commenters asked that BOEM analyze the quantity and impacts of rare earth minerals used in each WTG, for the Project as a whole, and cumulatively with other OSW projects.
- Two commenters noted the need for preparation, mitigation, and impact analysis for inadvertent releases and spills of oil or other pollutants associated with the Project.
- Two commenters expressed the need to disclose more details regarding the amount and types of materials being used and the country of origin for all materials, both raw and manufactured. In addition, one commenter noted that the EIS needs to describe the quality, standards, and certifications of the materials used to construct the Project.

5.13 Marine Mammals

Marine mammal comments included comments on potential impacts on species or their habitat, and notes species listed under the ESA and the Marine Mammal Protection Act (MMPA). Topics raised in this category include the following:

- Many commenters expressed concern regarding the status of the North Atlantic right whale (NARW) and that the proposed Project would adversely affect NARW, as well as other marine mammals and their habitat that may be found in the Lease Area. Impacts on marine mammals must be avoided and minimized to the full extent practicable. The commenters recommended that the EIS include anticipated habitat uses (e.g., foraging, migrating), threats, habitats, and prey that may be directly or indirectly affected by the proposed Project.
- Commenters expressed the need for long-term studies of changes to population, foraging, calving, and prey species abundance due to OSW projects.
- Commenters expressed concerns regarding unexploded ordnance encounters and Formerly Used Defense Sites in the Project area and management strategies that would be implemented to avoid harm during Project construction.
- A commenter stated that the potential overlap of Project construction and in-water activities should be fully evaluated in the EIS, as well as measures to avoid and minimize impacts on sensitive life stages of marine species, including marine mammals.
- A commenter expressed concern regarding prey density, and how turbulent wakes formed by ocean currents and strata mixing from Project activities will affect prey species in the Lease Area.
- A commenter stated that vessel strikes pose an unacceptable risk in this region, and BOEM must acknowledge that any vessel operating in this region has the potential to strike a NARW. The commenter felt that BOEM has significantly downplayed the risk of vessel strikes to endangered whales in previous OSW permitting documents and encouraged BOEM to provide a more robust quantitative analysis.
- A commenter suggested that BOEM monitor for oceanographic changes caused by the large-scale build-out of OSW energy that may affect the marine mammal prey base.

- Commenters stated BOEM should consider the location and width of the Project area to allow for turbine exclusion zones for the purpose of whale migration.
- Multiple commenters stated that the EIS should adhere to the ESA and the MMPA and should require an Incidental Take Rulemaking.
- A commenter requested BOEM consider the noise impacts on migration, specifically potentially exceeding hearing threshold shift criteria, cause loss of communication between and separation of females from calves, stranding, and loss of echolocation and other navigational abilities.
- Commenters noted that mitigation measures involving detection and turbine shut down are not viable for the large noise influence zones and multi-year operational timeframes, and that BOEM should suggest turbine exclusion zones to avoid disruption.
- BOEM should refer to NMFS' Technical Guidance for Assessing the Effects of Anthropogenic Sound on Marine Mammal Hearing for the noise impacts analysis.
- BOEM should consider the level and potential impacts of vessel-related noise during construction, particularly noise emitted by dynamic positioning systems. Reported source levels of noise from dynamic positioning systems vary.
- Commenters noted that digital aerial survey methods are likely to underestimate the occurrence of large whales and are not able to provide information on whale behavior, including foraging. These surveys therefore do not negate the need for additional multi-year shipboard and/or manned aerial surveys, as well as passive acoustic monitoring (PAM), in the Project area and broader Project region prior to construction.
- BOEM should not use the Duke University habitat density models as the sole information source from which to estimate marine mammal occurrence, density, and impact.
- BOEM must also require strong protections for other endangered and threatened marine mammal species. As a general matter, BOEM must take all necessary precautions to reduce the number of Level A takes (any act of pursuit, torment, or annoyance that has the potential to injure a marine mammal or marine mammal stock in the wild) and Level B takes (any act that has the potential to disturb [but not injure] a marine mammal or marine mammal stock in the wild by disrupting behavioral patterns, including, but not limited to, migration, breathing, nursing, breeding, feeding, or sheltering) for large whales to be as close to zero as possible.
- Commenters requested the following topics be analyzed, documented, or included in the EIS:
    - Increased spacing between OSW turbines and high-traffic areas through either increased spacing or based on consultation with the NMFS and the U.S. Coast Guard (USCG).
    - Competing uses and navigation impacts of OSW facilities. With increased or altered traffic patterns, the risk of collisions and spills of gas, oil, and chemicals may increase, with negative effects on water quality and marine life. Exposure to oil and other hydrocarbons from oil spills can drastically affect marine mammals and ecosystems.
    - Most recent and up-to-date scientific studies conducted for large whale species, including fin whale, NARW, blue whale, sei whale, and sperm whale.
    - Best available science and scientific studies into the environmental review and must consider a variety of local and regional data sources for conducting an analysis of the immediate and cumulative effects of the Project on marine mammals, particularly on species listed under the ESA and MMPA.

- Analysis of behavior avoidance as a result of high noise sources. New assumptions, equations, and models are needed to accurately assess the harm. In particular, the use of mean numbers also does not adequately capture the uncertainties involved in avoidance and other assessments.
- Impacts of climate change on migratory marine mammal species.
- Impacts from noise pollution and the risk of increased vessel strikes from construction and operations activities.
- Seasonal abundance and distribution of marine mammals, sea turtles, ESA-listed marine fish, anticipated habitat uses (e.g., foraging, migrating), threats, and habitats, as well as the prey on which these species depend, throughout the area that may be directly or indirectly affected by the Project.
- Vessel collision risk to large whales. BOEM should acknowledge the significant risk vessel strikes pose to NARW and other large whales and require the industry to reduce vessel speeds to 10 knots or less and take further measures to mitigate vessel collision risk.
- Documentation of best practices and methods that will be implemented to reduce the incidental take of marine mammals and turtles associated with construction and operations.

- Commenters expressed concern or requested that BOEM require the following regarding NARWs:
  - The Project's personnel should report all visual observations and acoustic detections of NARWs to NMFS or USCG as soon as possible and no later than the end of the protected species observer (PSO) shift. Project personnel must immediately report an entangled or dead NARW or other large whale species to NMFS, the Marine Animal Response Team, or USCG. Quarterly reports of PSO sightings data should be made publicly available to inform marine mammal science and protection.
  - The proposed Project does not occur in marine monuments or sanctuaries, HAPCs, including areas that include deep sea corals, Seasonal Management Areas (SMAs), or persistent Dynamic Management Areas (DMAs) created to reduce risk of vessel collision with NARWs. When SMAs or persistent DMAs cannot be avoided, the most stringent mitigation measures will be required. The EIS should analyze NARW abundance patterns to confirm that there is no overlap with SMAs or persistent DMAs.
  - Include clearance and exclusion zone distances for NARWs and other large whale species, which must be designed to eliminate Level A take and minimize behavioral harassment to the full extent practicable during the installation of gravity-based or suction bucket foundations, considering noise levels expected to be generated during installation. Installation of gravity-based and suction bucket foundations should not be initiated when a NARW or other large whale species is detected in the relevant clearance zone. These operations should be halted, unless continued installation activities are necessary for reasons of human safety or installation feasibility. Installation may resume when the lead PSO confirms no NARWs or other large species have been detected in the relevant clearance zones.
  - Commenters expressed general concern over underwater noise from the turbines that would block the entire adjacent 12-mile-wide migration corridor of the critically endangered NARW.
  - Commenters expressed general concern over the impact the Project would have on migratory patterns of marine mammals, specifically the NARW. If migratory patterns are altered,

whales may be more susceptible to beaching.

- Commenters expressed concern with noise impacts and potential injuries on NARW. Specifically, mortality events caused from sonar and seismic surveys and injury that may be caused from installation of foundations.
- Commenters expressed concern with impacts on whale foraging areas and that NARW have shifted their aggregation and feeding areas in recent years due to climate change.

5.14 Mitigation and Monitoring

Comments suggested overall strategies for mitigation and monitoring as well as proposed mitigation and monitoring measures. Topics raised in this category included the following:

- Commenters suggested mitigation measures to reduce the impact on night skies, including using the Aircraft Detection Lighting System, shielding, downward-pointing security lighting, adding motion sensors to security lighting, turning off lights when not needed during construction and operations, using the minimum lumen output needed on lights, and using warm color-temperature light when possible.
- Commenters encouraged BOEM to use best practices for all monitoring, reporting, and communications with stakeholders. Commenters also asked that BOEM discuss how monitoring results would be made available to regulatory agencies and the public.
- A commenter suggested that BOEM expand their monitoring and mitigation measures discussion regarding measures to employ to reduce potential impacts on whales, including the NARW, from noise and vessel strikes. Comments suggested potential mitigation measures on these topics including requiring timing restrictions for construction and detonation of unexploded ordnance, requiring slow vessel speed zones, requiring state-of-the-art noise attenuation measures and PAM, limiting types of survey gear, and requiring robust monitoring of whales and noise. Commenters asked that BOEM work closely with the National Oceanic and Atmospheric Administration (NOAA) and NMFS to develop mitigation and monitoring plans that include appropriate measures to avoid impacts on whales and their habitat.
- A commenter suggested mitigation measures to reduce potential impacts on specific fish and marine species and their habitats, including establishing buffer zones for avoidance around spawning grounds, HAPCs, SMAs, and DMAs; requiring slow vessel speed zones during peak migratory seasons; pausing construction during spawning seasons and during high presence of certain species; using non-invasive underwater equipment to create a minimal disturbance zone around crucial habitats; using noise dampening techniques during construction activities; and using adaptive management to guide mitigation as survey and monitoring results become available.
- Commenters noted that BOEM needs to provide remedy and mitigation options if impacts on commercial fishing are larger than anticipated. Commenters suggested various mitigation measures to offset potential impacts on the commercial fishing industry, including financial compensation, survey and collection of data regarding the impacts on commercial fishing from the Project throughout the life of the Project and on a cumulative basis, inclusion of transit lanes of four nautical miles, development of a Comprehensive Mariner Communications and Notifications Plan, and communication with the fishing industry regarding gear adaptations. Commenters also requested that BOEM continue to engage directly with the commercial fishing community regarding compensation and mitigation.

- Commenters asked that BOEM mitigate or minimize impacts on water quality from operations of converter stations at a project and cumulative level including impingement, entrainment, and discharge of heated and chlorinated effluent as well as from using a closed-cycle cooling system if the technology becomes available during operations.
- A commenter noted that if SF_6 switchgears are used, BOEM should consider mitigation measures for monitoring and leak detection to limit leaks to less than 1 percent.
- A commenter suggested mitigation measures for buried cable installation in areas of known high seabed mobility, including a robust siting analysis, mariner notifications of shallow-buried and exposed cables, cable protection measures, monitoring and maintenance of target burial depth, and adaptive management if repeated cable exposures occur.
- USEPA supported the development of a long-term monitoring plan to measure recovery of the benthic habitat from construction-related disturbances and to monitor for potential migration of invasive species. An action plan to address incomplete recovery or areas affected by invasive species should be considered.
- BOEM's assessment of the impacts on bats should be conservative, and employ the best available scientific methods, such as autodetection, acoustic monitoring at nacelle height, targeted tagging of bats, and thermal imaging technology.
- The EIS should include a comprehensive regional fisheries and benthic resources monitoring plan developed and implemented in collaboration and consultation with state fishery managers and scientists.
- BOEM should require training of all personnel working offshore on observing and identifying NARW and other large marine mammals and should require all service operating vessels to carry automated thermal detection systems.
- BOEM should require Atlantic Shores and all OSW developers, as part of the permitting process, to reduce speed of all Project-associated vessels of all sizes to 10 knots at all times and locations (i.e., transiting to/from a Project area) except in those circumstances where the best available scientific information demonstrates that NARW and other marine mammals do not use the area.
- The EIS should include vessel speed restrictions, focusing on actual risk rather than "relative risk," as well as other emission reduction best practices for ports, including Tier 4 Final USEPA certified equipment, or the use of marine shore power systems.
- The Brigantine Wilderness Area is a federally-designated Class I area, and as such, USEPA recommends coordination with USFWS for air permits and the identification of mitigation strategies to alleviate potential adverse air quality impacts in this area.
- To protect ESA-listed sea turtles as well as other affected marine species, avoidance and mitigation measures must include vessel speed restriction and noise reduction in the Project area.
- BOEM should commit to conducting comprehensive long-term science-based monitoring before, during, and after construction to document impacts on benthic habitat and EFH and recovery, compared to preconstruction survey baseline.
- BOEM should require field measurements throughout the construction process to ensure compliance with noise reduction requirements.

- Commenters recommended using dampeners on the structures and the construction equipment to reduce noise and vibrations from increased vessel traffic. Scour protections should also be installed.
- The EIS should use models produced from standardized monitoring/survey data collection methods to monitor birds, such as population estimates and migratory pathways.
- BOEM should examine a detailed adaptive ecosystem-wide management plan, describing how all conservation obligations afforded to affected avian species by multiple statutes, conservation policies, agreements, and treaties will be met. This comprehensive plan could include methods and standards for monitoring, avoidance, and mitigation, informed by current science and best available technologies, in ecosystem-wide approaches. The best management practices defined by this plan could be extended to other OSW projects in the region and all along the Atlantic coast that encompass important habitats for birds migrating along the Atlantic Flyway.
- To avoid, minimize, and mitigate adverse impacts on wildlife, the EIS must establish baseline data, using best available science, on current ecological conditions, accurately identifying resident and migratory species, and determining their population sizes in the offshore, coastal, and onshore ecosystems of the Lease Area.
- The EIS should identify all potential species-specific and ecosystem-wide impacts from the Project and evaluate operational noise and consider deployment of attenuation technologies to minimize impacts on marine wildlife.
- With respect to HVDC export, the EIS should consider using air-cooling systems, sustainable closed-loop sea water cooling systems, or emergent pumpless technologies, instead of an open-loop raw seawater cooling system to reduce adverse environmental impacts from HVDC transformer platforms.
- BOEM should require monitoring of acoustic clearance and exclusion zones using near real-time PAM, assuming a detection range of at least 10,000 meters, undertaken from a vessel other than the pile driving vessel, or from a stationary unit, to avoid the hydrophone being masked by construction-related noise.
- BOEM should require the presence of at least four vessel-based NOAA-certified PSOs following a two-on, two-off rotation, each responsible for scanning no more than 180 degrees of the horizon per pile driving location. Additional vessels must survey the clearance and exclusion zones at speeds of 10 knots. Consider deployment of additional observers and monitoring technologies (e.g., infrared, drones, hydrophones) to ensure comprehensive monitoring of clearance zones.
- BOEM should develop, report, and evaluate robust science-based avoidance, minimization, and mitigation measures employing emerging and established technologies, in continued early consultations with scientists, technology experts, federal agencies (NMFS, USFWS, Department of Defense, and Department of Energy), Tribal leaders, and all stakeholders to protect the natural and cultural resources in the Project area.
- BOEM should develop and implement a continued monitoring program to ensure that there is no significant deterioration of the environmental conditions or the existing natural resources from construction through the decommissioning phases.
- The EIS should consider the use of deterrent technologies to reduce collision risks to bats and birds and adaptive management strategies to reduce adverse impacts on all species, with particular emphasis on those already at risk of extinction.

- The EIS should assess deployment of a combination of noise abatement technologies, seasonal and diel restrictions of construction activities to minimize impacts, curtailment of site assessment, and characterization activities during times of highest risk.
- BOEM should consider a regional avian monitoring plan that includes baseline data collection protocols, acoustic and visual monitoring methods, and technologies (e.g., marine radar surveys, vessel surveys, personnel or digital aerial transect surveys, acoustic monitoring, radio telemetry, satellite telemetry) to fill knowledge gaps and to inform future OSW installation processes.
- The EIS must use best commercially available technology and methods to include a monitoring and research plan conducted transparently by NOAA or an independent party to assess and report the effects of the Project on the ocean ecosystem including marine habitats, wildlife, fishery resources and protected species, and changes compared to the baseline study. The monitoring program included in the EIS should include, but should not be limited to, chemical and sonic monitoring, assessment of physical alteration of the seafloor, currents and winds, visual and acoustic surveys for protected species, and biological/ecological surveys for marine wildlife presence and abundance.
- BOEM should work with OSW developers, fisheries, and scientists, and invest in scientific research and development of monitoring technologies to inform proactive adaptive management of affected species of all taxa and their habitats.
- BOEM should develop programmatic, ecosystem-wide best management practices as part of the OSW industry permitting requirements, based on current science and state-of-the-art/emergent technologies to protect natural resources in all OSW projects.
- BOEM should create a publicly available centralized data portal to serve as a clearinghouse of real-time data collection and dissemination for all OSW-related scientific and technological data. All decision-making data should be transparent and available for public review.
- BOEM should require monitoring the magnitude and extent of sound propagation during foundation construction via pile driving.
- BOEM should note that compensatory mitigation alone is not sufficient to meet NEPA requirements of avoiding, minimizing, and mitigating impacts on fisheries, nor does its implementation assure that an OSW project has been designed in a way that does not unreasonably interfere with fishing operations.
- BOEM should work with developers to ensure the NMFS survey is fully funded to mitigate affecting fish stocks and allocations to New Jersey.
- BOEM should require standardized methodology for using these new technologies across all projects in the Atlantic Outer Continental Shelf (OCS) to incorporate mortality data, and possibly displacement data, into ongoing cumulative effects analyses and adaptive management strategies, to validate collision risk models, and to measure impacts on ESA-listed species and other species of conservation obligation by augmenting tracking data with data from onsite detection technology. The EIS should specifically require the adoption of collision detection technologies when they are verified and commercially available, and BOEM should support their development and testing.
- BOEM must require that lease applicants report mortality events promptly and publicly.
- BOEM must require the following: acoustic monitoring for birds and bats; installation of Motus receivers on WTGs in the wind development area and support with upgrades or maintenance of

two onshore Motus receivers; deployment of Motus tags to track roseate terns, common terns, and/or nocturnal passerine migrants; pre- and post-construction bat surveys; avian behavior point count surveys at individual WTGs; and annual monitoring.

- A commenter suggested that transect surveys be accompanied by telemetry and radar studies.
- The EIS should provide more certainty that the developer will use adaptive management for birds and collect data to inform mitigation strategies to avoid, minimize, and mitigate impacts on birds.
- The EIS should consider painting the turbine blades black to reduce motion smear.
- BOEM should support supplemental field surveys for bats on the OCS, using similar methodology, requiring acoustic detectors to be placed at nacelle height on a subset of turbines constructed along the Atlantic OCS, and requiring that the data collected be made publicly available.
- BOEM should support research to determine whether it is possible to improve acoustic monitoring to enable better species identifications, such as being able to differentiate calls between the ESA-listed northern long-eared bat and other Myotis species.
- BOEM should support deploying Motus towers and/or other nanotag receiving towers in the coastal and offshore environment.
- BOEM should support efforts to tag additional individual bats with nanotag transmitters and GPS tags and support the development of bat monitoring technology for offshore WTGs, such as strike detection technology and thermal video.
- BOEM should support research on and testing of bat deterrent devices for offshore WTGs, such as ultraviolet lighting or ultrasonic noise emitters.
- BOEM should require OSW projects to support testing and deployment of best available monitoring and deterrent technologies, once developed, and require OSW projects to promptly report and make publicly available all monitoring and testing data.
- BOEM should consider deterrent technologies to prevent bats from approaching the wind turbines such as turbine coatings, ultrasonic noise emitters, and NRG Systems.
- The EIS should include specific mitigation of impacts on wetlands, seagrass beds, and other habitats. Seasonality of seagrass beds, turbidity, and spatiotemporal variability in the distribution of the beds should all be analyzed.
- NOAA and another commenter recommended that the EIS clearly identify what mitigation measures are included as part of the proposed Project and thus evaluated in the analysis, which measures are proposed as required, and which measures are optional and could be implemented by the developer to potentially reduce impacts. The document should provide information on how mitigation measures are considered in the context of the definition of effects levels (e.g., negligible, minor, moderate, major), and how mitigation would offset those levels of effect. An analysis of the effectiveness of any proposed mitigation should also be included in the NEPA document.
- The EIS should analyze temporary effects and anticipated recovery times for marine resources in the impacts analysis.

- The EIS should discuss the potential for bycatch measures resulting from protected species interactions due to shifts in fishing activity and increased uncertainty in protected species assessments.
- The EIS should include details of compensation plans describing qualifying factors, time constraints, allowed claim frequency, etc. if used as mitigation measures to reduce economic impacts from access loss/restriction, effort displacement, or gear damage/loss.
- BOEM should consider real-time and archival PAM as a secondary detection/monitoring system during construction, to increase situational awareness in vessel corridors and around the Project area, and to monitor the distribution of marine mammals in the Lease Area during construction and operation.
- BOEM should implement a regional federal scientific survey mitigation program that evaluates scientific survey designs; development of new survey approaches; development of interim provisional survey indices; integration of monitoring plans that address regional survey needs; and development of new data collection, analysis, management, and dissemination systems.
- BOEM should achieve no less than 10 decibels (Sound Exposure Level) in combined noise reduction and attenuation, taking baseline projections from prior noise measurements of unmitigated piles from Europe and North America.
- The EIS should evaluate all established and emergent technologies to minimize continuous operational noise both from the gearboxes (e.g., by acoustic decoupling of the turbine from the mast or platform, by installing direct drive turbines, or other technologies) as well as from propeller blades.

5.15 Navigation and Vessel Traffic

Navigation and vessel traffic comments addressed potential effects on the ability to operate and navigate personal or commercial vessels and potential increases of vessel traffic. Topics raised in this category included the following:

- Commenters indicated that the currently proposed navigation lanes between turbines are not large or numerous enough. Suggested navigation lanes were between 2 and 4 nautical miles. Additional commenters suggested designating transit lanes and corridors between leasing areas and other frequently utilized areas.
- Commenters indicated that submarine cables that are not properly sited, not buried deep enough, or not sufficiently maintained present a hazard to navigation.
- A commenter requested that the EIS include a vessel traffic plan to minimize the effects of increased vessel traffic due to Project construction and operations.
- Commenters requested that the EIS analyze the establishment of transit lanes through the lease areas as an alternative and consider effects on fishing economics, product quality, markets, fisheries management, and living marine resources. A commenter noted the importance for analysis to consider the history of collaboration and negotiation that led to transit lane proposals.
- A commenter requested that the EIS evaluate traffic considerations related to the construction phase of the Project on ports and operations and maintenance facilities, and the need for in-water safety zones.

- Several commenters expressed concern regarding the impacts on vessel navigation systems in and adjacent to the Lease Area, including search and rescue response, and the potential for increased allisions and collisions.
- Commenters requested that BOEM continue to coordinate with local, state, and federal agencies to ensure the best available information is utilized when developing alternatives and evaluating potential impacts.
- Commenters noted the increased risk and danger of collision with turbines for both commercial and recreational vessels, especially during inclement weather. The EIS should evaluate the Project's impact on transportation safety in regards to commercial shipping and safety of navigation, search and rescue operations, and offshore and land-based radar.
- The EIS should address the turbines' impact on access to existing fishing locations and potential impacts on meeting fishing quotas as more time is spent navigating through the Project site.
- The EIS should address how aerial and tugboat search and rescue operations will be affected by the proposed Project.

5.16 NEPA/Public Involvement Process

Commenters expressed appreciation for BOEM's requests for public input and for the opportunity to engage in discussions during in-person public meetings. Commenters offered various criticisms of and suggestions to enhance the NEPA and public engagement process:

- Select public meeting venues that are in potentially affected communities and easily accessible by public transportation. One commenter requested holding a future meeting in Long Beach Island because that community will experience visual impacts from the proposed Project.
- Hold public meetings during times that accommodate greater numbers of people.
- Commenters expressed a lack of trust in the public involvement process, citing a lack of advertisement for and awareness of public involvement opportunities and that the public's concerns were not being incorporated into the Project's design. Commenters also cited dissatisfaction in the timing of public involvement, stating that involvement should have begun earlier in the process.
- Use clear terminology and plain language in BOEM documents and informational materials and offer technical assistance as needed to enhance public understanding. One commenter requested minimal use of abbreviations, use of page numbers and hyperlinks to easily locate cited content, and compliance with accessibility requirements.
- Tailor outreach to low-income and minority communities with information about potential environmental justice impacts.
- Enhance transparency of the NEPA process by making all technical reports for the Project available to the public.
- Systematically classify impacts based on magnitude, direction, timing, and duration. One commenter indicated that impact classifications should be based on quantitative criteria.
- Establish appropriately sized geographic analysis areas (including affected coastal and inland areas) and evaluate potential impacts during all stages of construction, operation, and decommissioning.

- Considering the sequential or overlapping timing of BOEM public comment periods and complexity of the OSW projects, public comment periods should be at least 60 days to allow the public to adequately review and comment. One commenter requested that the public have the opportunity to make comments after reviewing the consultation documents such as the EFH Assessment and Biological Assessments/Opinions and requested that they be made publicly available on the BOEM website.
- Conduct additional outreach to fishing communities with the potential to be adversely affected by the Project.
- Conduct robust consultation with federally recognized Tribes, state-recognized Tribes, and non-federally recognized Tribes that encompasses the full extent of Project activities and considers historical presence of Tribes in the region.
- Ensure that the EIS complies with the applicable and federal laws including NEPA and required consultations under the ESA, MMPA, and the Magnuson-Stevens Fishery Conservation and Management Act.
- Coordinate regularly with affected states, local communities, federal agencies, and Tribes throughout all stages of the NEPA process, providing updates and requesting input on draft documents, and changes to the project design envelope (PDE).
- Incorporate into the EIS all NOAA requirements for adoption of the EIS.
- Maintain impartiality in press releases and communications and ensure analyses are conducted with objectivity and independence from the Biden-Harris Administration's directives to meet renewable energy goals.
- Ensure projects are developed in an environmentally responsible manner and that economic benefits are maximized and equitably distributed.
- BOEM should take a more uniform and consistent approach to the NEPA process for OSW projects. Commenters also suggested a programmatic EIS by region with tiered analyses for individual projects to provide a more comprehensive approach to OSW development.
- Commenters identified a range of impact producing factors and issues to consider in establishing the scope of the NEPA analysis and associated consultations.

5.17 Other Resources Uses

Comments related to aviation, marine minerals, military, research activities, and other resources.

5.17.1 Aviation

- No comments were related to aviation.

5.17.2 Marine Minerals

- No comments were related to marine minerals.

5.17.3 Military

Topics raised in this category include the following:

- Concern was raised that the Project could interact with or affect military use. One commenter stated concern for the military air radars in Gibbsboro, New Jersey.
- One commenter requested that BOEM identify U.S. military training and exercise areas in the EIS.
- Multiple commenters raised concerns that the proposed Project has the potential to degrade or interfere with radar relied upon by commercial aviation, military aviation, space launch vehicles, and commercial space launch activities.
- Multiple commenters expressed concern about security for the windmills and questioned if backup power will be provided in the case of power blackouts.

5.17.4 Research Activities

Topics raised in this category include the following:

- One commenter stated the impacts of once-through-cooling systems are unknown and requested a programmatic study in the New York Bight and Atlantic Shores North Lease Area to establish a baseline of organism density and analyze the potential impacts.
- The immediate, local warming effects of OSW farms should be studied and monitored.
- Natural wave actions, reduced winds, and produced eddies of the Gulf Stream are areas of research that need to be studied.
- There are concerns that the Project is being rushed as there is not enough science to determine the impacts of the wind industry on the ocean off the New York/New Jersey coast.

5.17.5 Other

Topics raised in this category included the following:

- Some commenters expressed concern about leasing federal ocean resources to large foreign companies, and requested that a summary of the U.S. and European companies be included in the EIS, confirming a fair and transparent notification/competitive bid/request for proposal process open to all companies, including the U.S.
- One commenter requested information regarding any microplastics that may come off of the turbines and what impacts would occur as a result.
- Multiple commenters expressed concern for why other OSW projects have been stopped or halted.

5.18 Other Topics Not Listed

This generalized comment category was used to collect other substantive comments. Specific topics could include (but are not limited to) coastal zone consistency, noise, materials and waste management, general wildlife, and electromagnetic field (EMF).

5.18.1 Coastal Zone Consistency

Comments addressed compliance with state Coastal Management Program(s). Topics raised in this category included the following.

- Commenters requested BOEM comply with the New Jersey Coastal Zone Management Act requirements. A commenter stated in 2004, the Governor, by Executive Order, authorized the NJ State Blue Ribbon Panel on OSW based on the Coastal Zone Management Act and requested that BOEM and Atlantic Shores incorporate these principles into the environmental analysis.

5.18.2 Offshore Noise

Comments addressed noise associated with construction, operations and maintenance, and decommissioning, including low-frequency noise. Topics raised in this category included the following:

- Concern was expressed about noise from the turbines and propellers, how far that noise may travel, and what effects it may have on humans and wildlife.
- Commenters asked that BOEM provide the ambient noise levels for the proposed Project and requested increased transparency with survey data.
- A commenter suggested that BOEM evaluate the potential application of sound penalties for onshore tonal noise impacts and assess the adequacy of proposed mitigation measures.
- A commenter suggested that BOEM request new guidelines on thresholds from noise for marine mammal behavioral disturbance from NMFS that are sufficiently protective and consistent with the best available science.
- Commenters expressed concern of harm from noise being a shared impact across a functionally diverse and taxonomically diverse range of invertebrates. One commenter suggested that controlled experiments and studies be conducted on species most likely to experience higher mortality as a result of anthropogenic sound.
- One commenter stated that additional studies are needed to analyze the impact of underwater noise on diving birds and BOEM should take a precautionary stance.
- Commenters requested that the EIS consider impacts specifically related to breeding, behavior, and feeding on NARW from noise.

5.18.3 Electromagnetic Fields

Comments addressed the potential impacts of EMF on wildlife and humans. Topics raised in this category included the following:

- The EIS should consider published research on the effect of EMF on wildlife, including effects on migration/orientation and other behaviors, and the distance those effects may reach from the Project's site.
- Commenters expressed concern over the potential impacts of Project-related EMFs on humans, benthic species, elasmobranchs, and long-range migratory and magnetic field-sensitive species including sea turtles, sharks, and other marine mammals. Commenters were concerned that OSW power cables would affect the ability of some species to orient and navigate, undermining their ability to migrate, find food sources, and procreate.
- Commenters requested analysis impacts from EMFs on finfish and invertebrates, including an evaluation of the differences in effects between high voltage alternating current (HVAC) and HVDC cables. One commenter asked BOEM to assess whether sharks would be attracted to export or interarray cables due to their sensitivity to EMF.

- Commenters asked that BOEM do a more thorough consideration on the impact of EMFs, specifically considering a more global perspective of impacts, evaluating export cable burial depth and methods and mitigation measures to minimized predicted EMFs, and undertaking an EMF study to establish baseline magnetic and electric fields.

5.19 Planned Activities Scenario/Cumulative Impacts

Commenters voiced the importance of a consistent and comprehensive cumulative impact analysis that includes other ongoing and reasonably foreseeable future OSW and non-OSW projects, as the Atlantic Shores North Project is likely to result in cumulative impacts on the same resources as nearby projects in the region.

Specifically, commenters requested that the EIS assess cumulative impacts of:

- Pre-existing subsea cables combined with installation of new offshore export cables, scour protection, and associated construction vessel activity from all projects in the region on various resources, including benthic habitat and organisms, water quality, air quality, commercial fishing activities, and estuaries.
- Heat emitted by interarray HVAC cables and offshore export cables.
- OSS cooling systems for multiple projects on impingement and entrainment of fish larvae, shellfish larvae, and primary productivity of zooplankton and phytoplankton.
- Hydrodynamic and wind wake effect of wind farms on ocean currents, vertical mixing, turbidity, and primary production.
- Reduced breeze and higher onshore temperatures
- Underwater noise impacts on marine mammals and other species.
- Increased vessel traffic, overlapping vessel routes, and sequencing of port uses during construction activities.
- Commercial fishing access and displacement, including the socioeconomic impacts and cost limitations on fishing communities that cannot relocate fishing activity, and fishing regulations that limit where and when fishing activities can occur.
- Alterations of benthic habitat and predator/prey interactions, increased pressure and space-use conflicts with recreational users, displacement due to wind farm construction and operations, and gear loss due to shipping traffic strikes on the commercial fishing industry.
- Fishing surveys noting that disruptions in survey activities would result in uncertainty in stock assessment, more conservative fisheries management measures, and impacts on fishery participants and communities.
- Environmental and economic effects on indigenous, coastal, and disadvantaged communities.
- Noise, infrastructure, and vessel traffic on species listed under the ESA and MMPA, including an analysis of the potential reduction in the effective migration space.

Additional topics regarding cumulative analysis include:

- A commenter recommended that BOEM take a holistic and flexible approach to utilizing the best available research, data, and information that could be applied to the combined development of all projects.
- A commenter expressed concern with the variability in the cumulative impacts by resource across OSW projects, including the no action alternative, even though these cumulative impact analyses generally include the same list of anticipated OSW projects.
- A commenter stated that BOEM's approach for initiating an NOI has been inconsistent across projects as some have a PPA in place while others do not. The commenter concluded that this inconsistency makes completing a cumulative analysis impossible as there is no appropriate time in the federal process to do so.

5.20 Proposed Action/Project Design Envelope

Commenters requested additional details or clarifications about the Proposed Action, including:

- Available seabed preparation and cable-laying techniques that could minimize impacts on benthic habitat and water quality.
- Maximum depth that cables for the voltage could be buried without overheating and assurance that minimum burial depth would be sufficient to minimize conflicts with fishing operations and surveys and effects of heat and EMF emissions.
- Detailed accounting of type, area, and location of rock armoring and scour protection to be used along the export cable in state and federal waters.
- Percentage of electrical loss through the export cables.
- Proposed horizontal directional drilling installation methods, including the potential for inadvertent returns and impacts associated with cofferdam installation(s).
- Explanation of suction-bucket jacket foundations and conditions most suitable for this foundation type.
- Whether the assertion made in the COP that underwater horizontal drilling noise would be less than 102 decibels at 1 meter from the drill was the result of empirical measurement or derived from a model of sound transmission.
- Reliability of electric facilities and compatibility with existing utility infrastructure including those documented in New York State Energy Research and Development Authority's Offshore Wind Cable Corridor Constraints Assessment.
- Additional rationale explaining why the use of closed-cycle OSS cooling systems would not be feasible.
- Anticipated time of year construction activities for each project would occur, to the extent known, in order to assess overlap with protected species and sensitive life stages.
- Emergency preparedness for severe storm events.
- Potential for icing of turbine blades and potential hazards to fishermen.
- Potential public health and safety concerns related to EMF emissions from export cables.

- Decommissioning of cable and scour protection areas and procedures for handling disturbance of reef habitat and resuspension of sediments.
- One commenter requested coordination with NMFS to determine which parts of the PDE would need to be narrowed to carry out a reasonable analysis that would support BOEM's requests for ESA and EFH consultation. The commenter explained that the Proposed Action, as defined for these consultations, should reflect a realistic scenario that incorporates any revisions to the PDE that have been made as well as any technical or logistical constraints on Project design and layout that have been identified.

5.21 Purpose and Need

Many comments related to the purpose and need for the Project cited a need to reduce reliance on fossil fuels and reduce GHG emissions contributing to climate change through deployment of renewable energy. Some commenters noted how the Project could contribute to federal and state renewable energy goals.

Topics raised in this category included the following:

- Some commenters expressed support for the proposed Project as a way to contribute to the Biden Administration's goal of 30 gigawatts of OSW by 2030, New Jersey's energy goals and align with Governor Murphy's OSW goals.
- Commenters indicated that the purpose and need is defined too narrowly and improperly tied to renewable energy goals and existing agreements and goals of the developer rather than GHG reduction targets. A commenter noted that the purpose and need should be defined broadly enough to allow for consideration of other reasonable alternatives.
- Commenters remarked that defining the purpose and need based on federal and state renewable energy goals and the agreements made by the developer does not relieve BOEM of its obligations to evaluate and minimize adverse impacts and conserve lands, waters, and biodiversity.

5.22 Recreation and Tourism

Topics raised in this category included the following:

- A commenter expressed concern that OSW projects would negatively affect marine navigation, sailing, power boating, whale watching, and recreational fishing and felt that BOEM has not adequately addressed the ramifications of such negative impacts.
- Many commenters felt that the turbines would be too close to the shore and expressed concern that the turbines would be visible from beaches and tourist facilities, which could dissuade tourists from visiting and recreating in these areas. Commenters stated this would negatively affect the local economy and lead to property value depreciation, impacts on the tourism industry, and increased rental property vacancies. Commenters cited studies showing the estimated loss of tourism revenue and property values and rentals based on the visible impacts of offshore turbines.
- One commenter expressed concern that OSW would negatively affect recreational diving.

5.23 Scenic and Visual Resources

Scenic and visual resources comments generally included concerns regarding the visual impact from the Project on historic properties and tourism onshore and requests for specifications on how impacts are analyzed in the EIS. Topics raised in this category included the following:

- Commenters asked that visual simulations consider a range of lighting, atmospheric, and seasonal conditions to reflect the full spectrum of visibility under various lighting conditions year-round, including the highest-visibility conditions such as nighttime lighting.
- One commenter noted a beneficial economic relationship between the ocean view and tourism in New Jersey, and how tourism may suffer due to visual impacts of the Project. Commenters noted that BOEM should consider and analyze the temporary and permanent visual and aesthetic impacts of the Project from onshore and offshore observation points.
- A commenter suggested methods to reduce impacts on the night sky, including directing lighting downward, shielding lights, adding motion sensors to some lights, using warm color lights, and others.

5.24 Sea Turtles

Sea turtle comments pertained to biological impacts on the species. Topics raised in this category included the following:

- Commenters requested that BOEM include seasonal distribution, abundance, and migration routes in the EIS for sea turtles.
- One commenter stated that increased sea turtle tagging and tracking studies are needed to better understand movement dive patterns, surface time, and habitat use, which can be used to advise monitoring and avoidance minimization and mitigation strategies.

5.25 Water Quality

Water quality comments pertained to pollution, sediment and deposition, and discharge. Topics raised in this category included the following:

- Commenters expressed concern regarding leaks of pollution, plastics, and toxic compounds that would be released into the ocean because of the proposed Project and requested that avoidance and mitigation measures be considered.
- A commenter requested that bottom sediments be evaluated for sediment contamination in any place the proposed Project would potentially disturb.
- A commenter requested that the EIS discuss the impacts of suspended soils and deposition related to the proposed Project's operations, along with measures to implement or reduce the impacts.
- One commenter requested that the EIS evaluate the impacts of ocean discharge from the proposed Project on the marine environment, including estimates of the quantities and composition of pollutants to be discharged, their potential to bioaccumulate and be transported, and whether the proposed Project can operate while consistently complying with applicable marine water quality criteria.

- A commenter requested that the EIS explain how vessel operations would prevent pollutant discharge from routine releases and potential release of nonnative organisms through the discharge of ballast water, as well as how the proposed Project would be consistent with state vessel discharge requirements.
- A commenter stated that the EIS should account for any changes or updates to the National Pollutant Discharge Elimination System–related information provided in the COP and the consequences those changes may have on the environmental impacts of the proposed Project.

5.26 Wetlands and Waters of the United States

Topics raised in this category included the following:

- USEPA recommended that the EIS include the range of design/construction measures highlighted in the COP to avoid and minimize impacts of transmission cables as they transition from shore, specifically in New Jersey bays such as Barnegat Bay and Great Egg Harbor.
- USEPA stated that in instances where fill is proposed or will otherwise affect wetlands or other waters of the U.S., the EIS should explain how the activity will comply with USEPA's Clean Water Act regulations issued under Section 404. They stated that the EIS should include an evaluation of ways the alternative can be designed to avoid or minimize direct and indirect impacts on wetlands and other waters.

5.27 General Support or Opposition, or Multiple Topics Discussed Generally

Many commenters expressed general support for the proposed Project. Some provided comments of support without providing justification. Others were supportive of the proposed Project for specific reasons, which included the following:

- The Project would represent an actionable step to address climate change by transitioning from use of fossil fuels to renewable energy and thereby reducing GHG emissions. Commenters stressed the importance of addressing climate change and reasoned that the potential environmental and visual impacts of the Project would be minor relative to effects of climate change such as sea level rise, rising ocean temperatures and acidification, extreme storms, severe heat events, and wildfires.
- The Project would contribute to national, state, and local OSW goals/commitments and energy needs of New Jersey and/or New York State.
- The Project would create high-paying, union jobs supported by labor agreements, would benefit the local and state economies, and would contribute to the development of a domestic OSW supply chain.

Many commenters requested that the Project be approved in full and as expeditiously as possible considering the urgent need to address climate change.

Other commenters expressed opposition to the Project or urged that BOEM exercise caution and objectivity in its decision. Specific reasons cited by commenters expressing opposition to the Project included:

- The Project may cause adverse impacts on benthic communities, water quality, fish, and wildlife and loss of biodiversity from development of OSW.
- There are uncertainties and data gaps with available studies and scientific information and need for additional monitoring to fully evaluate the impacts of OSW development.
- The Project may have visual impacts on coastal communities where WTGs and associated lighting would be visible.
- Distrust for the relationships and motives of the federal government and private companies in developing OSW.

Appendix A. List of Submissions and Individual Comments by Resource or NEPA Topic

Table of Contents

List of Tables

A.1. Introduction

ICF's process for analyzing public comments builds upon our commercial web-based CommentWorks® software product. As a first step, we downloaded and processed electronic copies of the comments from the www.regulations.gov site, so that we could then import these data into CommentWorks. A hierarchical outline was developed to include key issues provided by BOEM staff, issues addressed by the commenters, as well as categories identified in the Notice. ICF staff reviewed the comment letters, identifying the substantive excerpts within each submission ("bracketing"), and used the issue outline to associate each excerpt to the issue(s) to which it applies ("coding"). The end product of the bracketing and coding analysis is this "comment excerpt-by-issue report" – a report generated in CommentWorks that includes the *verbatim text* of substantive comment excerpts sorted by issue.

A.2. Index of Comment Submissions Sorted by Submission Number

Table A-1 lists the name and agency or organization affiliation (if any) for each person who provided a scoping submission. The submission identification (ID) number listed below corresponds to the Comment IDs referenced in Section A-3.

Table A-1 List of Submission Identifications, Names, and Affiliations

Submission ID	Individual Name	Agency/Organization Name
BOEM-2024-0008-0002	jean publie	
BOEM-2024-0008-0003	Tom Famulary	
BOEM-2024-0008-0004	Noel Quinn	
BOEM-2024-0008-0005	James Binder	
BOEM-2024-0008-0006	Donna Piraino	
BOEM-2024-0008-0007	Diane Snelson	
BOEM-2024-0008-0008	Robert Maryott	
BOEM-2024-0008-0009	Anonymous	
BOEM-2024-0008-0010	Arlene Mangin	
BOEM-2024-0008-0011	Sean Fales	
BOEM-2024-0008-0012	Christine Childs	
BOEM-2024-0008-0013	Claire Dalessio	
BOEM-2024-0008-0014	Joseph Gleeson	
BOEM-2024-0008-0015	Sue Liebross	
BOEM-2024-0008-0016	Alison Adams-Woodford	
BOEM-2024-0008-0017	Joan Fitzpatrick	
BOEM-2024-0008-0018	Pam Naprstek	
BOEM-2024-0008-0019	Terrence Thompson	
BOEM-2024-0008-0020	Kathleen Frenchu	
BOEM-2024-0008-0021	Janet Werfel	
BOEM-2024-0008-0022	Nancy Robbins	
BOEM-2024-0008-0023	Barry Trogu	
BOEM-2024-0008-0025	Anonymous	
BOEM-2024-0008-0026	Anonymous	

Submission ID	Individual Name	Agency/Organization Name
BOEM-2024-0008-0028	Anonymous	
BOEM-2024-0008-0030	Anonymous	
BOEM-2024-0008-0032	Raymond Valinoti	
BOEM-2024-0008-0034		Green Team First Congregational Church Montclair NJ
BOEM-2024-0008-0035	Eric Johnson	
BOEM-2024-0008-0037	Barbara Friedman	
BOEM-2024-0008-0038	Mark Canright	
BOEM-2024-0008-0040	Gregory Liano	
BOEM-2024-0008-0042	George Gehring	
BOEM-2024-0008-0043	James Guenther	
BOEM-2024-0008-0044	Matt King	
BOEM-2024-0008-0045	Michael Roulier	
BOEM-2024-0008-0046	Kathleen Harper	
BOEM-2024-0008-0047	Gary Frederick	
BOEM-2024-0008-0048	Ram Shah	
BOEM-2024-0008-0049	Sam Zappala	
BOEM-2024-0008-0050	Rajdeep Usgaonker	
BOEM-2024-0008-0051	Anonymous	
BOEM-2024-0008-0052	Stephen Knowlton	
BOEM-2024-0008-0053	Ben Vitale	
BOEM-2024-0008-0054	Dr. ERIC Davis	
BOEM-2024-0008-0055	Raymond Valinoti	
BOEM-2024-0008-0056	Denise Lytle	
BOEM-2024-0008-0060	Brian Boyle	
BOEM-2024-0008-0061	Anonymous	
BOEM-2024-0008-0062		New Jersey's 9th Legislative District Delegation
BOEM-2024-0008-0063		NJ State Chamber of Commerce
BOEM-2024-0008-0064	Anonymous	
BOEM-2024-0008-0065	Patrick Cozza	
BOEM-2024-0008-0066	Robert Ankosko	
BOEM-2024-0008-0067	Mark Canright	
BOEM-2024-0008-0068	Anonymous	
BOEM-2024-0008-0069	Virginia Murray	
BOEM-2024-0008-0070	Maria Savettiere	
BOEM-2024-0008-0071	Doreen Pavese	
BOEM-2024-0008-0072	Robin McConekey	
BOEM-2024-0008-0073	BONNIE JONES	
BOEM-2024-0008-0074	Bob Van norman	
BOEM-2024-0008-0075	christine taylor	

Submission ID	Individual Name	Agency/Organization Name
BOEM-2024-0008-0076	Gina Masessa	
BOEM-2024-0008-0077	Anonymous	
BOEM-2024-0008-0078	John Nichols	
BOEM-2024-0008-0079	Eric Nussbaum	
BOEM-2024-0008-0080	Kathryn Nguyen	
BOEM-2024-0008-0081	Patrick Cozza	
BOEM-2024-0008-0082	Anonymous	
BOEM-2024-0008-0083	Anonymous	
BOEM-2024-0008-0086	Anonymous	
BOEM-2024-0008-0088	Anonymous	
BOEM-2024-0008-0089	Anonymous	
BOEM-2024-0008-0090	Anonymous	
BOEM-2024-0008-0095	Anonymous	
BOEM-2024-0008-0109	Anonymous	
BOEM-2024-0008-0111	Anonymous	
BOEM-2024-0008-0114	Michelle Leo	
BOEM-2024-0008-0115	Silvia Murray	
BOEM-2024-0008-0116	James Dilks	
BOEM-2024-0008-0117	Lisa Bond	
BOEM-2024-0008-0118	Lisa Bond	
BOEM-2024-0008-0119	Sick Andtired	
BOEM-2024-0008-0120	Susan Swezeny	
BOEM-2024-0008-0121	Enrique Nunez	
BOEM-2024-0008-0122	Pamela Ryan	
BOEM-2024-0008-0123	James Monaco	
BOEM-2024-0008-0124		Southern NJ Development Council
BOEM-2024-0008-0125	Joe Ferrandino	
BOEM-2024-0008-0126	Richard Osler	
BOEM-2024-0008-0127	Robin McConekey	
BOEM-2024-0008-0128	Robin McConekey	
BOEM-2024-0008-0129	Michael Szczesny	
BOEM-2024-0008-0130	Deb Gardiner	
BOEM-2024-0008-0131	Christine A	
BOEM-2024-0008-0132	John Reading	
BOEM-2024-0008-0133	Jeffrey Brooker	
BOEM-2024-0008-0134	Mary DellaValle	
BOEM-2024-0008-0135	Enrique Nunez	
BOEM-2024-0008-0136	Susan Kinsella	
BOEM-2024-0008-0137	Patricia Hilliard	
BOEM-2024-0008-0138		Defend Brigantine Beach Inc., and Downbeach

Submission ID	Individual Name	Agency/Organization Name
BOEM-2024-0008-0139	Anthony Hagen	
BOEM-2024-0008-0140	Anonymous	
BOEM-2024-0008-0141		NJ ALLIANCE FOR ACTION
BOEM-2024-0008-0145	Anne Price	
BOEM-2024-0008-0146	Judith Tyson	
BOEM-2024-0008-0147	Regina Littwin	
BOEM-2024-0008-0148	Tom Littwin	
BOEM-2024-0008-0150	Denise Brush	
BOEM-2024-0008-0151	Lorraine Hafner	
BOEM-2024-0008-0152	Peggy L	
BOEM-2024-0008-0153	wendy mccrann	
BOEM-2024-0008-0154	Sean Crimmins	
BOEM-2024-0008-0155	Anonymous	
BOEM-2024-0008-0156	Ed Toland	
BOEM-2024-0008-0157	William Casey	
BOEM-2024-0008-0158	Kath Bizzarro	
BOEM-2024-0008-0159	Tom Jones	
BOEM-2024-0008-0172	Nadia Fay	
BOEM-2024-0008-0190	Mary Smith	
BOEM-2024-0008-0211	Verna Lindskoog	
BOEM-2024-0008-0249	Kelsey Lardiere	
BOEM-2024-0008-0256	Gayle Dadian	
BOEM-2024-0008-0259	Elissa Campanella	
BOEM-2024-0008-0346	Alex Stavis	
BOEM-2024-0008-0361	Christine Christopoul	
BOEM-2024-0008-0364	susab keating	
BOEM-2024-0008-0383	Catherine Kulp	
BOEM-2024-0008-0401	Michael Riordan	
BOEM-2024-0008-0403		Surfside Foods, LLC
BOEM-2024-0008-0409	Brian Russo	
BOEM-2024-0008-0410	Pamela Horovitz	
BOEM-2024-0008-0421	Brenda Riley	
BOEM-2024-0008-0426	William Amann	
BOEM-2024-0008-0430	Anonymous	
BOEM-2024-0008-0434	Richard Van Fleet	
BOEM-2024-0008-0437	Marilyn Dipaolo	
BOEM-2024-0008-0444	Theresa Klepczynski	
BOEM-2024-0008-0445	Bethe Frazer	
BOEM-2024-0008-0446	Robert Van Norman	
BOEM-2024-0008-0448	Teresa Silletti	

Submission ID	Individual Name	Agency/Organization Name
BOEM-2024-0008-0449	lisa marie	
BOEM-2024-0008-0450	Katelynn Corcoran	
BOEM-2024-0008-0451	Louise Neal	
BOEM-2024-0008-0452	Michael Lang	
BOEM-2024-0008-0453	Jody Bielski	
BOEM-2024-0008-0454	Tanya Wyant	
BOEM-2024-0008-0456	Regina Alfonso	
BOEM-2024-0008-0457	Lawrence Cutalo	
BOEM-2024-0008-0458	James McConekey	
BOEM-2024-0008-0459	Fran Friedrich	
BOEM-2024-0008-0460	Charles Kocher	
BOEM-2024-0008-0461	Luisa Conlin	
BOEM-2024-0008-0462	Penny Campbell	
BOEM-2024-0008-0463	A Coil	
BOEM-2024-0008-0464	Marisol Vazquez	
BOEM-2024-0008-0465	Cheryl Light	
BOEM-2024-0008-0466	Robert Stohrer	
BOEM-2024-0008-0467	Ron Fenton	
BOEM-2024-0008-0468	Concerned Citizen	
BOEM-2024-0008-0469	Kathy Goffredi	
BOEM-2024-0008-0470	Susan Carril	
BOEM-2024-0008-0472	Jeff Gelnaw	
BOEM-2024-0008-0473	Mimi Glaspey	
BOEM-2024-0008-0474	Chris Esposito	
BOEM-2024-0008-0475	Tara Betsch	
BOEM-2024-0008-0476	Sally McCarty	
BOEM-2024-0008-0477	Angela McKeon	
BOEM-2024-0008-0478	Tina Kourakos	
BOEM-2024-0008-0479	Anthony Rimikis	
BOEM-2024-0008-0480	Mark Licker	
BOEM-2024-0008-0481	Anonymous	
BOEM-2024-0008-0483	Trina Garrett	
BOEM-2024-0008-0484	Evelyn Cantelmo	
BOEM-2024-0008-0485	E. Robb	
BOEM-2024-0008-0487	Martha Lodge	
BOEM-2024-0008-0488	Colleen Dâ€™Abbene	
BOEM-2024-0008-0489	j. m.	
BOEM-2024-0008-0491	James Snyder	
BOEM-2024-0008-0492	Daryl Jakucs	
BOEM-2024-0008-0494	Veronica Saunders	

Submission ID	Individual Name	Agency/Organization Name
BOEM-2024-0008-0495	Anonymous	
BOEM-2024-0008-0496	Jeanne Pappas	
BOEM-2024-0008-0497	joseph Magiera	
BOEM-2024-0008-0498	Anonymous	
BOEM-2024-0008-0500	Jennifer Convertino	
BOEM-2024-0008-0501	Jeremy Blunt	
BOEM-2024-0008-0502	Anonymous	
BOEM-2024-0008-0503	Donna Scharfetter	
BOEM-2024-0008-0504	Kevin Peterson	
BOEM-2024-0008-0505	Penny Campbell	
BOEM-2024-0008-0507	Anonymous	
BOEM-2024-0008-0508	Christina Kramer	
BOEM-2024-0008-0509	Robert Garrett	
BOEM-2024-0008-0510	Karen Brooks	
BOEM-2024-0008-0511	Eleanor Hill	
BOEM-2024-0008-0512	Mary Sweeney	
BOEM-2024-0008-0513	Deanna Stearns	
BOEM-2024-0008-0514	Susan Kinsella	
BOEM-2024-0008-0515	Kelley Butler	
BOEM-2024-0008-0516	Victoria Leyden	
BOEM-2024-0008-0517	Donna Lafleur	
BOEM-2024-0008-0518	Vickie Klawitter	
BOEM-2024-0008-0519	Gail DeRitis DeRitis	
BOEM-2024-0008-0520	Anonymous	
BOEM-2024-0008-0521	Anonymous	
BOEM-2024-0008-0522	Linda Labrutto	
BOEM-2024-0008-0523	Annette Mikalouskas	
BOEM-2024-0008-0524	Sharon Mahoney	
BOEM-2024-0008-0526	Darlene Holden	
BOEM-2024-0008-0527	Rose Willis	
BOEM-2024-0008-0528	Heather Riley	
BOEM-2024-0008-0529	Kathleen Harper	
BOEM-2024-0008-0531	Adrienne Tully	
BOEM-2024-0008-0532	Pam Callender	
BOEM-2024-0008-0533	Anita Pieri	
BOEM-2024-0008-0534	Anonymous	
BOEM-2024-0008-0535	Tina Craig	
BOEM-2024-0008-0536	Richard Sarnes	
BOEM-2024-0008-0537	Anonymous	
BOEM-2024-0008-0538	Mary Smith	

Submission ID	Individual Name	Agency/Organization Name
BOEM-2024-0008-0539	Trudy Getler	
BOEM-2024-0008-0541	Anonymous	
BOEM-2024-0008-0542	Diane Mastrogiacomo	
BOEM-2024-0008-0543	Christina Romeo	
BOEM-2024-0008-0544	Anonymous	
BOEM-2024-0008-0545	Tom Jones	
BOEM-2024-0008-0546	S W	
BOEM-2024-0008-0547	Anonymous	
BOEM-2024-0008-0548	Jill morrison	
BOEM-2024-0008-0549	William Graham	
BOEM-2024-0008-0550	AJ Conte	
BOEM-2024-0008-0551		RODA
BOEM-2024-0008-0552	Robin Vanderbilt	
BOEM-2024-0008-0553	Jamie Briggs	
BOEM-2024-0008-0554	Shawn Morton	
BOEM-2024-0008-0555	Anonymous	
BOEM-2024-0008-0556	Carol Brinkmann	
BOEM-2024-0008-0557	Joseph Pallante	
BOEM-2024-0008-0558	Tony Moutinho	
BOEM-2024-0008-0559	Gina Cobianchi	
BOEM-2024-0008-0560	ArleneArlene Mangin	
BOEM-2024-0008-0561	Peg Welles	
BOEM-2024-0008-0562	James Ulrich	
BOEM-2024-0008-0563	Carrie Buchanan	
BOEM-2024-0008-0564	Jane Cagney	
BOEM-2024-0008-0565	Jason Dragseth	
BOEM-2024-0008-0567	Maryanne Klemmer	
BOEM-2024-0008-0569	Craig Osten	
BOEM-2024-0008-0570	Sandra Prout	
BOEM-2024-0008-0571	RobertRobert Duggan	
BOEM-2024-0008-0572	Anonymous	
BOEM-2024-0008-0573	Susan Stinson	
BOEM-2024-0008-0574	George Thayer	
BOEM-2024-0008-0575		LaMonica Fine Foods, surf clam industry
BOEM-2024-0008-0576	Anonymous	
BOEM-2024-0008-0577	Harry Harrison	
BOEM-2024-0008-0578	Capt Todd MacGregor	
BOEM-2024-0008-0579	Daneen Osten	
BOEM-2024-0008-0580	Sharon Aloi	
BOEM-2024-0008-0581	Anonymous	

Submission ID	Individual Name	Agency/Organization Name
BOEM-2024-0008-0582	Mark Cremonni	
BOEM-2024-0008-0584	Nathalie Turner	
BOEM-2024-0008-0585	Mark Weismiller	
BOEM-2024-0008-0586	Theresa Teti	
BOEM-2024-0008-0587	Eryn Topper	
BOEM-2024-0008-0588	Kassandra Funkhouser	
BOEM-2024-0008-0589	Mary Beth Feeney	
BOEM-2024-0008-0590	Murray Robertson	
BOEM-2024-0008-0591	Ben S	
BOEM-2024-0008-0593	Capt. Eric Muller	
BOEM-2024-0008-0594	Kerry McGrath	
BOEM-2024-0008-0596	Joyce Wirpsza	
BOEM-2024-0008-0597	Craig Turner	
BOEM-2024-0008-0599	Anonymous	
BOEM-2024-0008-0601	Nicole Viola	
BOEM-2024-0008-0602	John Reading	
BOEM-2024-0008-0604	Chris Lorah	
BOEM-2024-0008-0605	Florissa Boublis	
BOEM-2024-0008-0606	Gail Sara	
BOEM-2024-0008-0608	Dan Freitag	
BOEM-2024-0008-0609	Anonymous	
BOEM-2024-0008-0610	Anonymous	
BOEM-2024-0008-0611		Save Long Beach Island, Inc.
BOEM-2024-0008-0612	Jacqueline D'Eletto	
BOEM-2024-0008-0613	Laurie Tarter	
BOEM-2024-0008-0614	Elizabeth Terrel	
BOEM-2024-0008-0615	Richard Munkittrick	
BOEM-2024-0008-0616	Anonymous	
BOEM-2024-0008-0617	Joanne Cicala	
BOEM-2024-0008-0618	nick milonas	
BOEM-2024-0008-0619	Kathleen Harper	
BOEM-2024-0008-0621	Fernando Irizarry	
BOEM-2024-0008-0622	Anne Muller	
BOEM-2024-0008-0623	Anonymous	
BOEM-2024-0008-0626	Amy Jones	
BOEM-2024-0008-0627	Steven Ullmer	
BOEM-2024-0008-0628	Michael Gilchrist	
BOEM-2024-0008-0629	Tom Cassella	
BOEM-2024-0008-0630	Lindsay Osten	
BOEM-2024-0008-0631		American Waterways Operators

Submission ID	Individual Name	Agency/Organization Name
BOEM-2024-0008-0632	Glen Garvin	
BOEM-2024-0008-0633		Mid-Atlantic Fishery Management Council and New England Fishery Management Council
BOEM-2024-0008-0634	Anonymous	
BOEM-2024-0008-0635	John Clarke	
BOEM-2024-0008-0636	Anonymous	
BOEM-2024-0008-0637	Anonymous	
BOEM-2024-0008-0638	Amy Shnider	
BOEM-2024-0008-0640	Anne Baker	
BOEM-2024-0008-0641	David Geer	
BOEM-2024-0008-0642	Anonymous	
BOEM-2024-0008-0643	Pamela Griesser	
BOEM-2024-0008-0645	Patrice Tullai	
BOEM-2024-0008-0646	Anonymous	
BOEM-2024-0008-0647		FWS
BOEM-2024-0008-0648	Brooke A	
BOEM-2024-0008-0649	BONNIE JONES	
BOEM-2024-0008-0650	Robert Coyne	
BOEM-2024-0008-0651	Elizabeth Quattrochi	
BOEM-2024-0008-0652	Diane Snelson	
BOEM-2024-0008-0653	Michael Devlin	
BOEM-2024-0008-0654	Justin Alpert	
BOEM-2024-0008-0655	Susan Connaughton	
BOEM-2024-0008-0656	Janet Robinson	
BOEM-2024-0008-0657	Rahul Del	
BOEM-2024-0008-0658	Darlene Mayser	
BOEM-2024-0008-0659	prefer not To disclose	
BOEM-2024-0008-0660	Jaime Mirabella	
BOEM-2024-0008-0661	Anonymous	
BOEM-2024-0008-0666		New Bedford Port Authority
BOEM-2024-0008-0684	Kevin Doorley	
BOEM-2024-0008-0687	Lisa Bond	
BOEM-2024-0008-0701	Crystal Ankosko	
BOEM-2024-0008-0711	allen magrini	
BOEM-2024-0008-0715	Richard Suer	
BOEM-2024-0008-0728	Brian Thompson	
BOEM-2024-0008-0730	Elizabeth Raleigh	
BOEM-2024-0008-0731	Margaret Middaugh	
BOEM-2024-0008-0736	Roy Fischman	
BOEM-2024-0008-0742	T Kirckof	

Submission ID	Individual Name	Agency/Organization Name
BOEM-2024-0008-0747	Daneen Osten	
BOEM-2024-0008-0749	Holly Marcello	
BOEM-2024-0008-0761	John Deputato	
BOEM-2024-0008-0762	kathleen corsey	
BOEM-2024-0008-0772	Jay Hutchinson	
BOEM-2024-0008-0778	Prof. Edgar Gunter	
BOEM-2024-0008-0780	Anonymous	
BOEM-2024-0008-0788	Peter Clare	
BOEM-2024-0008-0789	Anonymous	
BOEM-2024-0008-0793	vanessa fiedler	
BOEM-2024-0008-0796	John Garay	
BOEM-2024-0008-0799	Darlene Gossett	
BOEM-2024-0008-0800	Anonymous	
BOEM-2024-0008-0801	Sucheta Madhukar	
BOEM-2024-0008-0803	Salvador Del Mar	
BOEM-2024-0008-0805	Christine Fritsch	
BOEM-2024-0008-0806	George Saul	
BOEM-2024-0008-0808	Dennis De Forest	
BOEM-2024-0008-0813	Laurie Maxwell	
BOEM-2024-0008-0815	l. thompson	
BOEM-2024-0008-0818	John O'Keeffe	
BOEM-2024-0008-0821	Sue Liebross	
BOEM-2024-0008-0822	Kenneth Hammond	
BOEM-2024-0008-0828	Peter Trojano	
BOEM-2024-0008-0833	Gina Masessa	
BOEM-2024-0008-0836	ElizabLiz McManamy	
BOEM-2024-0008-0837	Chris Monahan	
BOEM-2024-0008-0838	Kenneth Jones	
BOEM-2024-0008-0841	John Reilly	
BOEM-2024-0008-0842	Anonymous	
BOEM-2024-0008-0844	Edward Leo	
BOEM-2024-0008-0852	Sylvia Lockwood	
BOEM-2024-0008-0856	Marianne Geer	
BOEM-2024-0008-0859	Anonymous	
BOEM-2024-0008-0861	Suzanne Bibbo	
BOEM-2024-0008-0862	MARY SHAPPELL	
BOEM-2024-0008-0864	Thomas Vogel	
BOEM-2024-0008-0865	John Munks	
BOEM-2024-0008-0868	Anonymous	
BOEM-2024-0008-0869	Anonymous	

Submission ID	Individual Name	Agency/Organization Name
BOEM-2024-0008-0871	Annette Mikalouskas	
BOEM-2024-0008-0872	Melinda Decker	
BOEM-2024-0008-0873	Micchelle Gonzalez	
BOEM-2024-0008-0874	Kevin Simon	
BOEM-2024-0008-0875	Leslie Long	
BOEM-2024-0008-0876	Dan Sikora	
BOEM-2024-0008-0877	Greg Golden	
BOEM-2024-0008-0878	ernest mellon	
BOEM-2024-0008-0879	Fran Szymanek	
BOEM-2024-0008-0880	Jeanette York	
BOEM-2024-0008-0882	Kathryn Sabatini	
BOEM-2024-0008-0883	Amy Shnider	
BOEM-2024-0008-0884	BONNIE JONES	
BOEM-2024-0008-0885	Anonymous	
BOEM-2024-0008-0886	Linda Labrutto	
BOEM-2024-0008-0887	Carolyn Collins	
BOEM-2024-0008-0889	Karen Larson	
BOEM-2024-0008-0890	Anonymous	
BOEM-2024-0008-0891	Michelle Bo	
BOEM-2024-0008-0892	Penny Campbell	
BOEM-2024-0008-0893	Caryn Byrnes	
BOEM-2024-0008-0894	McCarthy Joanne	
BOEM-2024-0008-0896	Martha Stearns	
BOEM-2024-0008-0897	Andrew Bonnafant	
BOEM-2024-0008-0898	Bernadette Monari	
BOEM-2024-0008-0899	Edward McCormick	
BOEM-2024-0008-0900	Roslyn McGivney	
BOEM-2024-0008-0901	Donald Muckerheide	
BOEM-2024-0008-0902	David Foell	
BOEM-2024-0008-0904	Andrew Coskey	
BOEM-2024-0008-0905	Elizabeth Gallagher	
BOEM-2024-0008-0906	Anonymous	
BOEM-2024-0008-0907	James Kelly	
BOEM-2024-0008-0909	Robert Vanhorn	
BOEM-2024-0008-0910	Cynthia Kasprzak	
BOEM-2024-0008-0911		C.A.P.E.
BOEM-2024-0008-0912	Joanne Gifford	
BOEM-2024-0008-0913	Anonymous	
BOEM-2024-0008-0914	Bill Moller	
BOEM-2024-0008-0915	Anonymous	

Submission ID	Individual Name	Agency/Organization Name
BOEM-2024-0008-0916	Sue Franko	
BOEM-2024-0008-0917	Jennifer Guarino	
BOEM-2024-0008-0919	Barbara Wright	
BOEM-2024-0008-0920	Margaret Lebak	
BOEM-2024-0008-0921	Anonymous	
BOEM-2024-0008-0922	John Maxwell	
BOEM-2024-0008-0923	Amy Keating	
BOEM-2024-0008-0924	Barbara Skinner	
BOEM-2024-0008-0925	Darrie Lynch	
BOEM-2024-0008-0926	Jeffrey Brooker	
BOEM-2024-0008-0927	Marie Tyler Wiley	
BOEM-2024-0008-0928		NJDEP
BOEM-2024-0008-0929	Kristin Rayfield	
BOEM-2024-0008-0930	Anonymous	
BOEM-2024-0008-0931	William Wasilewski	
BOEM-2024-0008-0933	Dave Baldwin	
BOEM-2024-0008-0934	Tiffany Strout	
BOEM-2024-0008-0936	Mimi Glaspey	
BOEM-2024-0008-0939	Anonymous	
BOEM-2024-0008-0941	Leslie Richardson	
BOEM-2024-0008-0942	Lynne Norman	
BOEM-2024-0008-0943	John Mcgough	
BOEM-2024-0008-0945		WhoPoo App
BOEM-2024-0008-0946		C.A.P.E.
BOEM-2024-0008-0947	Harry Nicol	
BOEM-2024-0008-0948	John Caruana	
BOEM-2024-0008-0949	Keri Farley	
BOEM-2024-0008-0951	Anonymous	
BOEM-2024-0008-0952		Rutgers, The State University of New Jersey, Center for Ocean Observing Leadership
BOEM-2024-0008-0953	Kristina Parker	
BOEM-2024-0008-0955	Stephanie Hazelton	
BOEM-2024-0008-0956	Irene Murdza	
BOEM-2024-0008-0957	Anonymous	
BOEM-2024-0008-0958	Anonymous	
BOEM-2024-0008-0959	Tony Barbini	
BOEM-2024-0008-0960	Mary Lou Malone	
BOEM-2024-0008-0961	Charles Wilson	
BOEM-2024-0008-0962	Barbara Sommer	
BOEM-2024-0008-0963	Ashley Villari	

Submission ID	Individual Name	Agency/Organization Name
BOEM-2024-0008-0964	Sally Barbato	
BOEM-2024-0008-0965	Anonymous	
BOEM-2024-0008-0966	Peggy Evernham	
BOEM-2024-0008-0967	Robyn Federico	
BOEM-2024-0008-0968	David Moser	
BOEM-2024-0008-0969		Long Beach Township, NJ
BOEM-2024-0008-0970	denise boccia	
BOEM-2024-0008-0972	Kennedy Kevin	
BOEM-2024-0008-0973	Anonymous	
BOEM-2024-0008-0974	Anonymous	
BOEM-2024-0008-0975	Nick C	
BOEM-2024-0008-0976	Andy Kennedy	
BOEM-2024-0008-0977	Jill Magill	
BOEM-2024-0008-0978	Anonymous	
BOEM-2024-0008-0980	LoriAnn DeForest	
BOEM-2024-0008-0981	Anonymous	
BOEM-2024-0008-0982	Ian Glennen	
BOEM-2024-0008-0983	Kathleen Sullivan	
BOEM-2024-0008-0984	Virginia Renehan	
BOEM-2024-0008-0985	Tony Alexander	
BOEM-2024-0008-0986	Maria Johns	
BOEM-2024-0008-0987	Paul Beisel	
BOEM-2024-0008-0988	Lisa Gallant	
BOEM-2024-0008-0989		Vacation Rentals Jersey Shore LLC
BOEM-2024-0008-0990	Donna Gadomski	
BOEM-2024-0008-0991	Anonymous	
BOEM-2024-0008-0992	Anonymous	
BOEM-2024-0008-0993	Anonymous	
BOEM-2024-0008-0994	A Bell	
BOEM-2024-0008-0995	peter silletti	
BOEM-2024-0008-0996	Apostolos Gerasoulis	
BOEM-2024-0008-0997	Anonymous	
BOEM-2024-0008-0998	KEVIN KERNAN	
BOEM-2024-0008-0999	Alissa Kanowitz	
BOEM-2024-0008-1000	Carol Ward	
BOEM-2024-0008-1001	Vince Marasco	
BOEM-2024-0008-1002	Carol Ward	
BOEM-2024-0008-1003	Margaret Bagley	
BOEM-2024-0008-1004	Michael Dean	
BOEM-2024-0008-1005	Cheryl Wille	

Submission ID	Individual Name	Agency/Organization Name
BOEM-2024-0008-1006	Anonymous	
BOEM-2024-0008-1007		New York State
BOEM-2024-0008-1008	John Casagrande	
BOEM-2024-0008-1009	Mary Lyons-Kim	
BOEM-2024-0008-1010		Cape May County, NJ
BOEM-2024-0008-1011		Lake View Community Association
BOEM-2024-0008-1012	Lucy Smorto	
BOEM-2024-0008-1013	J L	
BOEM-2024-0008-1014	Karen Ironside	
BOEM-2024-0008-1015	Shelley Nugent	
BOEM-2024-0008-1016	Joan Wensel	
BOEM-2024-0008-1017	Patricia Bernson	
BOEM-2024-0008-1018	Anonymous	
BOEM-2024-0008-1019	Anonymous	
BOEM-2024-0008-1020	Linda Ciccarelli	
BOEM-2024-0008-1021		EDF Renewables North America
BOEM-2024-0008-1022	Tracey Anselmo	
BOEM-2024-0008-1023	Birdie Wiskitin	
BOEM-2024-0008-1024	Laurence Bernson	
BOEM-2024-0008-1025	Gilbert Foulon	
BOEM-2024-0008-1026	Anonymous	
BOEM-2024-0008-1027	Jeri Yundi	
BOEM-2024-0008-1028		BlueGreen Alliance
BOEM-2024-0008-1029	Douglas Crawford	
BOEM-2024-0008-1030	karen eachus	
BOEM-2024-0008-1031	Carolyn Agresta	
BOEM-2024-0008-1032	Mary Hodge	
BOEM-2024-0008-1033	Richard Feldgus	
BOEM-2024-0008-1034	Lisa Zangara	
BOEM-2024-0008-1035	Heidi DeCesare	
BOEM-2024-0008-1036	Kevin Collins	
BOEM-2024-0008-1037	Beverly Neyenhouse	
BOEM-2024-0008-1038	Kathleen Harper	
BOEM-2024-0008-1039	AARON DURAN	
BOEM-2024-0008-1040	Denise Boccia	
BOEM-2024-0008-1042	Lorraine Duran	
BOEM-2024-0008-1043		Borough of Sea Girt, NJ Planning Board
BOEM-2024-0008-1044		ECOncrete
BOEM-2024-0008-1045	Anonymous	
BOEM-2024-0008-1047	deborah mundy	

Submission ID	Individual Name	Agency/Organization Name
BOEM-2024-0008-1048	Eileen Feldgus	
BOEM-2024-0008-1049	Renee Henrich	
BOEM-2024-0008-1050	Anonymous	
BOEM-2024-0008-1051	Elyse Horowitz	
BOEM-2024-0008-1052	Glen Grauer	
BOEM-2024-0008-1053		Defend Brigantine Beach Inc and Downbeach
BOEM-2024-0008-1055	Anonymous	
BOEM-2024-0008-1062	Kim Finkle	
BOEM-2024-0008-1063	Ashley Donahue	
BOEM-2024-0008-1064		New Jersey Wind Works Coalition
BOEM-2024-0008-1065	Darcy Baia-Cohen	
BOEM-2024-0008-1066	Anonymous	
BOEM-2024-0008-1067	Cortney Baldwin	
BOEM-2024-0008-1068	Denise Weinberg	
BOEM-2024-0008-1069		Clean Ocean Action
BOEM-2024-0008-1070		National Wildlife Federation et al.
BOEM-2024-0008-1071	Donna Knepple	
BOEM-2024-0008-1072	Anonymous	
BOEM-2024-0008-1073	M E Kessler	
BOEM-2024-0008-1074	William Ames	
BOEM-2024-0008-1075	dr michael dickman	
BOEM-2024-0008-1076	Carolyn Zomer	
BOEM-2024-0008-1077	Steve Smith	
BOEM-2024-0008-1079	Anonymous	
BOEM-2024-0008-1080	Carol M	
BOEM-2024-0008-1081	Whitney Stanbury	
BOEM-2024-0008-1082	Denis Meyers	
BOEM-2024-0008-1083		Borough of Sea Girt, New Jersey
BOEM-2024-0008-1084	Anonymous	
BOEM-2024-0008-1085	Anonymous	
BOEM-2024-0008-1086	MaryAnne Reinert	
BOEM-2024-0008-1087	Anonymous	
BOEM-2024-0008-1088	Mary O'Keeffe	
BOEM-2024-0008-1089	Gloria Stone	
BOEM-2024-0008-1091		New Jersey Environmental Lobby
BOEM-2024-0008-1092	Sharon GARRY	
BOEM-2024-0008-1093	Anonymous	
BOEM-2024-0008-1094	Anonymous	
BOEM-2024-0008-1095	Michael Mason	
BOEM-2024-0008-1096	Teresa Boyle-Vellucci	

Submission ID	Individual Name	Agency/Organization Name
BOEM-2024-0008-1097	Chris Hewitt	
BOEM-2024-0008-1098	Denise Boccia	
BOEM-2024-0008-1099	Joseph Kucay	
BOEM-2024-0008-1100	Erica Librizzi	
BOEM-2024-0008-1101	Eileen Barker	
BOEM-2024-0008-1102	Kristian Hill	
BOEM-2024-0008-1104	Athena Clark	
BOEM-2024-0008-1105	Jennifer Maver	National Park Service
BOEM-2024-0008-1106		National Oceanic and Atmospheric Administration
BOEM-2024-0008-1107	Kevin Hartnett	
BOEM-2024-0008-1108	Mark Austin	Environmental Protection Agency Region 2
BOEM-2024-0008-1109	Marlene Asselta	Southern New Jersey
BOEM-2024-0008-1110		Berkeley Township
BOEM-2024-0008-1111	Jack Fullmer	New Jersey Council of Divers and Clubs
BOEM-2024-0008-1112		Sea Girt New Jersey
BOEM-2024-0008-1113	John E. Harmon, Sr.	African American Chamber of Commerce of New Jersey (AACCNJ)
BOEM-2024-0008-1114	Christina M. Renna	Chamber of Commerce Southern New Jersey
BOEM-2024-0008-1115	James G Borowski	Borough of Lavallette
BOEM-2024-0008-1116	Meg Geer	Lavallette Environmental Cleanup Club
BOEM-2024-0008-1117	Penny Applegate	
BOEM-2024-0008-1118	Jackie Greger	Sierra Club
BOEM-2024-0008-1119	Richard Isaac	
BOEM-2024-0008-1120	Joseph Ciccone	
BOEM-2024-0008-1121	Gina Zalewski	
BOEM-2024-0008-1122	Anonymous	
BOEM-2024-0008-1123	Gregg Mele	Mele for America
BOEM-2024-0008-1124	Anjuli Ramos	Sierra Club
BOEM-2024-0008-1125	Amy Covert	
BOEM-2024-0008-1126	Barbara Sommer	
BOEM-2024-0008-1127	Brad Williams	
BOEM-2024-0008-1128	Chris BAECKSTROM	
BOEM-2024-0008-1129	Annie Licata	Clean Ocean Action
BOEM-2024-0008-1130	Dave Mitchell	
BOEM-2024-0008-1131	Carl Van Warmerdam	Deep Sea Defenders
BOEM-2024-0008-1132	Dennis De Forest	
BOEM-2024-0008-1133	Diane Snelson	

Submission ID	Individual Name	Agency/Organization Name
BOEM-2024-0008-1134	Lori Malvey	
BOEM-2024-0008-1135	Eileen Feldgus	
BOEM-2024-0008-1136	Michael Casey	
BOEM-2024-0008-1137	William Link	John Birch Society
BOEM-2024-0008-1138	Kathleen Harper	
BOEM-2024-0008-1139	Patricia Brennan	
BOEM-2024-0008-1140	John Magliochetti	
BOEM-2024-0008-1141	Kathleen Sullivan	
BOEM-2024-0008-1142	Jennifer Serafin	
BOEM-2024-0008-1143	Sylvia Lockwood	
BOEM-2024-0008-1144	Leslie Listwa	
BOEM-2024-0008-1145	Karen Sours	
BOEM-2024-0008-1146	William Healy	New Jersey Alliance for Action
BOEM-2024-0008-1147	James Wolf	
BOEM-2024-0008-1148	Patricia Robertson	
BOEM-2024-0008-1149	Jackie Greger	Sierra Club
BOEM-2024-0008-1150	Laurie Maxwell	
BOEM-2024-0008-1151	Mike Jacobs	
BOEM-2024-0008-1152	Paulina O'Connor	New Jersey Offshore Wind Alliance
BOEM-2024-0008-1153	Penni Breitling	
BOEM-2024-0008-1154	Robert Zuczek	
BOEM-2024-0008-1155	Peggy Middaugh	Unitarian Universalist Faith Action New Jersey
BOEM-2024-0008-1156	Roseanne Serowatka	
BOEM-2024-0008-1157	John Deputato	
BOEM-2024-0008-1158	Michael Skelly	Unitarian Universalist Faith Action
BOEM-2024-0008-1159	Adam Nolan	New Jersey League of Conservation Voters
BOEM-2024-0008-1160	Tricia Devoi	
BOEM-2024-0008-1161	Anthony Marucci	
BOEM-2024-0008-1162	Carmella Marucci	
BOEM-2024-0008-1163	Elaine Furda	
BOEM-2024-0008-1164	Carolyn Rush	
BOEM-2024-0008-1165	Chris Placitella	
BOEM-2024-0008-1166	Nancy Donovan	
BOEM-2024-0008-1167	Chris Placitella	
BOEM-2024-0008-1168	Daneen Osten	
BOEM-2024-0008-1169	Justin Macko	Borough of Sea Girt
BOEM-2024-0008-1170	Craig Kierce	
BOEM-2024-0008-1171	Aviva Gans	
BOEM-2024-0008-1172	Carl Van Warmerdam	Deep Sea Defenders

Submission ID	Individual Name	Agency/Organization Name
BOEM-2024-0008-1173	Scott Carlin	
BOEM-2024-0008-1174	Allen Magrini	
BOEM-2024-0008-1175	Brian Thomas	
BOEM-2024-0008-1176	Eric Nussbaum	
BOEM-2024-0008-1177	Margaret Bagley	
BOEM-2024-0008-1178	Paulina O'Connor	New Jersey Offshore Wind Alliance
BOEM-2024-0008-1179	Reverend Ronald Tubb	Green Faith
BOEM-2024-0008-1180	Kathleen Harper	
BOEM-2024-0008-1181	Roberta Elizabeth Mauch	
BOEM-2024-0008-1182	Lisa Bonanno	
BOEM-2024-0008-1183	John Breitling	
BOEM-2024-0008-1184	Richard Isaac	
BOEM-2024-0008-1185	Nicole Memmber	
BOEM-2024-0008-1186	James Thompson	New Jersey League of Conservation Voters
BOEM-2024-0008-1187	Anjuli Ramos	Sierra Club
BOEM-2024-0008-1188	Laurie Maxwell	
BOEM-2024-0008-1189	John Deitchman	
BOEM-2024-0008-1190	Jane Fasullo	
BOEM-2024-0008-1191	Tiziana Bottino	Sierra Club
BOEM-2024-0008-1192	Michael Jacobs	
BOEM-2024-0008-1193	Pauline Thomas	
BOEM-2024-0008-1194	Sheronda Allen	New Jersey Progressive Equitable Energy Coalition
BOEM-2024-0008-1195	Sylvia Lockwood	
BOEM-2024-0008-1196	Anthony Taddeo	New Jersey League of Conservation Voters
BOEM-2024-0008-1197	Glenn Gorab	
BOEM-2024-0008-1198	Tara MC Quaid	
BOEM-2024-0008-1199	Samantha Gardner	
BOEM-2024-0008-1200	John Deputato	
BOEM-2024-0008-1201	Anthony Rose	Natural Resources Protective Association
BOEM-2024-0008-1202	Kathryn Nguyen	
BOEM-2024-0008-1203	Robyn Federico	
BOEM-2024-0008-1204	Teresa Boyle--Vellucci	
BOEM-2024-0008-1205	Bob Stern	Save Long Beach Island Incorporated
BOEM-2024-0008-1206	Leslie Mangold	
BOEM-2024-0008-1207	Liz Treston	
BOEM-2024-0008-1208	Peggy Middaugh	

A.3. Individual Comments by Resource or NEPA Topic

The following are verbatim comment excerpts as written by the commenters. The purpose of presenting this material in its verbatim form is to preserve the exact words of the commenter as they relate to each issue.

A.3.1 Air Quality and Climate Change

Comment Number: BOEM-2024-0008-0005-0006
Commenter Type: Individual
Commenter: James Binder

Comment Excerpt Text:

Other issues of importance that have not been considered by BOEM in other recent EISs include impact on local climate change, i.e., the reduction of onshore wind on LBI as a result of the wind mills extracting wind energy from the existing wind flow. The result could decrease the cooling effect of onshore winds on LBI and result in additional use of power consuming air conditioners, a negative for climate change. Another issue is impact on air quality. Opponents contend that ozone levels could increase as a result of the wake effects of the wind turbines. Current attainment and nonattainment areas could be harder pressed to meet air quality standards. Why has an analysis of the applicability of the Clean Air Act not been done? Also, how about increased air emissions from the increased ship traffic for windmill operations and maintenance. How about reduced dispersion of air pollutants due to the reduction in offshore wind speed. Please provide a detailed analysis of impact on local climate change, the applicability of the Clean Air Act and potential for air quality impacts.

Comment Number: BOEM-2024-0008-0038-0001
Commenter Type: Individual
Commenter: Mark Canright

Comment Excerpt Text:

Greetings! I am a farmer who cares about investing in clean renewable energy like wind.

New Jerseyans want and need offshore wind for the sake of our environment and generations to come. Wind energy is clean energy. Unlike energy from sources like coal or methane gas, wind energy does not require burning fossil fuels and does not release harmful, climate-destabilizing pollution.
By cutting our fossil fuel reliance, offshore wind will help alleviate the impacts of climate change statewide. Our communities have already faced the impacts of inland flooding, severe rain and weather events.

Comment Number: BOEM-2024-0008-0056-0003
Commenter Type: Individual
Commenter: Denise Lytle

Comment Excerpt Text:

Production and combustion of fossil fuels releases dangerous pollutants into the air. These pollutants result in a wide range of health impacts including early death, heart attacks, respiratory disorders, stroke, and exacerbation of asthma. Communities of color often suffer a disproportionate burden of these health impacts due to systemic racism and historically living closer to power plants. Investing in offshore wind won't just fight climate change, it will also help communities and urban residents breathe easier by lessening air pollution.

Comment Number: BOEM-2024-0008-0090-0001
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

As we know all too well, the climate crisis poses an imminent threat to coastal communities and states across the entire Northeast. We've continued to experience inland flooding, sea level rise, severe rain, historic snowfalls, devastating hurricanes, and other extreme weather events, and as the climate crisis worsens, so will the weather.
To achieve the necessary carbon emission reductions to protect our communities from the climate crisis, we need a major transition in our energy sector now. The only way to protect and sustain our communities and our environment is the safe and responsible transition to 100 percent clean energy and the development of clean energy sources like offshore wind.
Wind energy is clean energy. Unlike energy from sources like coal or methane gas, wind energy does not require burning fossil fuels and does not release harmful, climate-destabilizing pollution.
By cutting our fossil fuel reliance, offshore wind will help alleviate the impacts of climate change statewide. Our communities have already faced the impacts of inland flooding, severe rain and weather events. This can go on no more.

Comment Number: BOEM-2024-0008-0111-0001
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

Climate & Environment
- As we know all too well, the climate crisis poses an imminent threat to coastal communities and states across the entire Northeast. We've continued to experience inland flooding, sea level rise, severe rain, historic snowfalls, devastating hurricanes, and other extreme weather events, and as the climate crisis worsens, so will the weather.
- To achieve the necessary carbon emission reductions to protect our communities from the climate crisis, we need a major transition in our energy sector now. The only way to protect and sustain our communities and our environment is the safe and responsible transition to 100 percent clean energy and the development of clean energy sources like offshore wind.
- Wind energy is clean energy. Unlike energy from sources like coal or methane gas, wind energy does not require burning fossil fuels and does not release harmful,
climate-destabilizing pollution.
- By cutting our fossil fuel reliance, offshore wind will help alleviate the impacts of climate change statewide. Our communities have already faced the impacts of inland flooding, severe rain and weather events. This can go on no more.

Comment Number: BOEM-2024-0008-0111-0003
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

Health
- Production and combustion of fossil fuels releases dangerous pollutants into the air. These pollutants

result in a wide range of health impacts including early death, heart attacks, respiratory disorders, stroke, and exacerbation of asthma. Communities of color often suffer a disproportionate burden of these health impacts due to systemic racism and historically living closer to power plants.
- Investing in offshore wind won't just fight climate change, it will also help communities and urban residents breathe easier by lessening air pollution.
- BOEM must act quickly to secure our clean energy future to protect the health of an entire generation of children.

Comment Number: BOEM-2024-0008-0135-0003
Commenter Type: Individual
Commenter: Enrique Nunez

Comment Excerpt Text:

New Jersey should pursue the development of offshore wind energy. Transitioning to renewable sources like offshore wind is crucial for reducing greenhouse gas emissions and combating climate change. The shallow waters off the East Coast, particularly in the mid-Atlantic region, provide ideal conditions for offshore wind farms with stable wind resources and proximity to major population centers.

Comment Number: BOEM-2024-0008-0138-0010
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

The project will generate unacceptable air quality impacts in Atlantic County which has one of the lowest levels of air pollution in NJ.

Comment Number: BOEM-2024-0008-0138-0013
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

The COP fails in its stated purpose of reducing greenhouse gas (GHG) emissions and stemming climate change and the Climate Change Benefit, is often cited but never specified.

Comment Number: BOEM-2024-0008-0138-0021
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

Aside from the water polluting toxic sludge produced during the refining process to extract and purify the trace minerals from raw ore, the mining itself produces dust and the factories refining it emit air pollution. The fact that all this air pollution occurs thousands of miles away in countries with little or no environmental protection laws and limited, if any, enforcement certainly no laws or policing comparable in stringency to those of the in the United Statesshould not exempt BOEM from acknowledging, analyzing, and disclosing the air pollution resulting from the ASOWNJ project. These emissions, contrary to BOEM's claims based on its limited accounting, are likely to be major and negative, not minor, moderate, or beneficial.

Comment Number: BOEM-2024-0008-0346-0001
Commenter Type: Individual
Commenter: Alex Stavis

Comment Excerpt Text:

This offshore wind project will help reduce air pollution leading to beneficial health outcomes, especially in communities of color that bear the brunt of emissions from fossil-fuel burning power plants and suffer disproportionate health impacts like asthma.

Comment Number: BOEM-2024-0008-0524-0003
Commenter Type: Individual
Commenter: Sharon Mahoney

Comment Excerpt Text:

Weather experts are predicting this season in the Atlantic Ocean will be more active than ever for hurricanes with 30 named hurricanes and 4-7 major hurricanes. How can you possibly recycle the turbines after a major hurricane comes through and thrashes these turbines, leaving the parts splattered all over our ocean and eventually washing up our beaches in NJ. What measures are in the construction plan and the operation & maintenance plan to take care of this? What is the responsibility of Atlantic Shores in cleaning this up?

Comment Number: BOEM-2024-0008-0551-0003
Commenter Type: Advocacy Group
Organization: RODA

Comment Excerpt Text:

RODA unequivocally supports efforts to address climate change, there is little to no information from BOEM on the net greenhouse gas (GHG) reductions and what mitigative benefits to climate change are offered by the proposed projects. Any such analysis should include all stages of an OSW project, from surveying to decommissioning of turbines. This should be specific to the materials used for a project as the larger projects would require more source materials, potentially having a greater environmental impact, and different materials carry their own ramifications. A simple approach to calculate net carbon dioxide emissions from OSW projects has been developed and concluded that OSW had lower net carbon dioxide emissions compared to fossil fuels but it was higher than that onshore wind [Footnote 3: Wang & Sun. 2012. Life cycle assessment of CO2 emissions from wind power plants: Methodology and case studies. Renewable Energy. 43: 30-36.].

The carbon emissions of an OSW project itself may be difficult to calculate without knowing how much of the grid will actually be in operation. It is also important to understand both what amount of GHG would be offset by these projects, as well as what additional emissions may be produced. Activities associated with renewable energy including OSW will contribute to carbon emissions and more information is needed as to the scale of this contribution. Resource-intensive activities associated with production of turbine components and batteries will have further impacts. Some available literature considers much of the carbon dioxide emissions associated with construction and operations to be mitigated by recycling of the turbines after decommissioning. However, it will be impossible to know whether components will be recycled after the Atlantic Shores North project is decommissioned if this information is not included in the EIS.

Comment Number: BOEM-2024-0008-0562-0002
Commenter Type: Individual
Commenter: James Ulrich

Comment Excerpt Text:

Firstly, I am troubled by the potential Scope 2 and Scope 3 emissions associated with offshore wind turbines. Despite being touted as a clean energy solution, the manufacturing, installation, and maintenance of these turbines can generate substantial carbon emissions, particularly if the materials are sourced from distant locations or if fossil fuels are used in the production process. These emissions must be carefully evaluated and mitigated before proceeding with such projects.

Comment Number: BOEM-2024-0008-0573-0003
Commenter Type: Individual
Commenter: Susan Stinson

Comment Excerpt Text:

Thirdly- why if the goal is to generate clean energy that reduces CO2 emissions, why in their own documentation do OSW state that there will be negligible decline in CO2?

Comment Number: BOEM-2024-0008-0611-0036
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

The EIS needs to include a site-specific hurricane risk assessment of the frequency of high wind events, and what the impact would be on the turbine complex. This should also specify how or whether repairs will be made, or whether turbines will be removed if they are rendered non-operational by such events.

Comment Number: BOEM-2024-0008-0651-0001
Commenter Type: Individual
Commenter: Elizabeth Quattrochi

Comment Excerpt Text:

By contrast, Offshore Wind Turbines will not reduce carbon emissions when looking at it over its lifespan, factoring in carbon expended during mining, manufacture, transport, construction, maintenance and decommissioning. Turbines are an environmental mess, housing gallons of oil, hydraulic fluid and other dangerous chemicals that can leak into the ocean.

Comment Number: BOEM-2024-0008-0728-0001
Commenter Type: Individual
Commenter: Brian Thompson

Comment Excerpt Text:

I write in Support of Atlantic Shores and our desperate need for renewable energy to replace toxic fossil fuel sources.
CO2 in our atmosphere has now hit 438ppm on some recent days and heat records are being broken around the world, at least somewhere, every day. This is NOT sustainable.

Comment Number: BOEM-2024-0008-0822-0001
Commenter Type: Individual
Commenter: Kenneth Hammond

Comment Excerpt Text:

I urge you to proceed with the environmental impact statement for the Atlantic Shores offshore wind project. This project will help power over 1 million homes and bring jobs to our communities, and is an urgent and necessary step toward averting the worst effects of climate change.

Here in New Jersey, the impacts of the climate crisis are clear. This past winter had many stretches that felt more like spring or summer. Last year, we all remember those days when it was unsafe to go outdoors due to the smoke from record-breaking wildfires in Quebec [7]. In 2021, the remnants of Hurricane Ida caused tornadoes and widespread flooding around the state, including in this district [8].

Without immediate and urgent action, these sorts of disasters will only become more severe and frequent. The livelihoods of our children and grandchildren in New Jersey and around the world depend on the decisions that we make today. We need our leaders to start treating the climate crisis like the emergency that it is.

Please move forward with this environmental impact report and reject efforts to block this project, so that New Jersey communities and the environment can be protected from harmful pollution and the worst effects of fossil-fuel driven climate change.

Comment Number: BOEM-2024-0008-0934-0004
Commenter Type: Individual
Commenter: Tiffany Strout

Comment Excerpt Text:

The amount of carbon the ocean consumed by being health and left alone far out number what thousands of non-recyclable, fossil fuel driven, monstrosities could ever do

Comment Number: BOEM-2024-0008-0964-0006
Commenter Type: Individual
Commenter: Sally Barbato

Comment Excerpt Text:

BOEM's own document states that these turbine projects will have no measurable effects on climate change.

There is also no evidence on what will happen if there is a category 3 or 4 hurricane.

Comment Number: BOEM-2024-0008-0990-0002
Commenter Type: Individual
Commenter: Donna Gadomski

Comment Excerpt Text:

How exactly does this project "fight climate change" and where is the factual, historical data that proves that CO2 from the burning of fossil fuels is responsible for a "climate crisis"?

Comment Number: BOEM-2024-0008-1007-0008
Commenter Type: State Government
Organization: New York State

Comment Excerpt Text:

3. Requested analyses associated with air quality:

a. Identify air pollutants associated with all phases of construction, operation, and decommissioning of the Project and quantify emissions of all Clean Air Act criteria pollutants, greenhouse gases (GHGs) (including upstream emissions), and any hazardous air pollutant. Describe the Project's compliance with all federal and State air quality regulations, including those related to GHG emissions. Describe the Project's compliance with General Conformity requirements of the Clean Air Act for the NY-NJ-CT non-attainment area. Perform an analysis of impacts of increased air emissions on Potential Environmental Justice Areas and NYS disadvantaged communities{{Footnote 4: See Environmental Conservation Law Section 75-0101(5)}} and discuss mitigations.

Comment Number: BOEM-2024-0008-1010-0012
Commenter Type: Local Government
Organization: Cape May County, NJ

Comment Excerpt Text:

This is consistent with the findings of a 2018 study (which BOEM did not cite) where researchers at the Harvard School of Engineering determined that the impacts to air quality and greenhouse gas emissions are expected to increase over the next decade as a result of the construction of wind energy projects, while also warming surface temperatures over the next century and reducing cooling sea breezes. [Footnote 7: Large-scale wind power would require more land and cause more environmental impact than previously thought (David Keith, Harvard John A. Paulson School of Engineering and Applied Sciences, 2018) https://seas.harvard.edu/news/2018/10/large-scale-wind-power-would-require-more- land-and-cause-more-environmental-impact] The Harvard researchers found that the warming effect in the continental U.S. caused by wind turbines is actually larger than the effect of reduced emissions for the first century of its operation. This is unacceptable to Cape May County, which tends to exhibit marginally cooler temperatures than landlocked areas, and which helps drive visitors to the county's beaches on hot and sunny days. The County urges BOEM to include in its cumulative analysis that these projects are likely to cause a net-warming effect that could severely impact Cape May County. The County would also like BOEM to provide a cumulative analysis of wind wake effects and impacts to wind currents as well as a cumulative analysis of short-term versus long-term air quality impacts from construction.

Comment Number: BOEM-2024-0008-1021-0007
Commenter Type: Industry
Organization: EDF Renewables North America

Comment Excerpt Text:

Provide clean, renewable energy to the Northeastern U.S. by displacing electricity from fossil fuel power plants. The Project will result in a significant net decrease in harmful air pollutant emissions region-wide and will reduce 6.13 million tons of greenhouse gas (GHG) emissions annually, which is equivalent to avoiding the emissions from 1.21 million cars every year. By reducing regional GHG emissions, the Project can help mitigate additional effects of climate change (e.g., sea level rise, shifts in species' distributions, and increases in energy system costs) that impact both public health and the environment.

The Project will also reduce regional emissions that are linked to increased rates of early death, stroke, heart attacks, and respiratory disorders and contribute to acid rain, ocean acidification, and ground level ozone/smog.

Comment Number: BOEM-2024-0008-1064-0001
Commenter Type: Advocacy Group
Organization: New Jersey Wind Works Coalition

Comment Excerpt Text:

Pursuant to New Jersey's goal of achieving 100 percent clean energy by 2035, responsible offshore wind development is needed to diversify our State's energy portfolio with renewable alternatives to fossil fuels. Whereas coastal communities are at the greatest risk of climate change-induced damages, such as rising sea levels and more severe hurricanes, offshore wind will allow New Jersey to harness the power of our coastline to prevent the climate crisis from worsening. The proposed ASOW North project will help push New Jersey closer to our clean energy goals by generating 2,500 MW of renewable energy, enough to power more than 1.1 million homes. This project will also set the stage for New Jersey to become a national leader in offshore wind energy, paving the way for other states to follow suit.

At this stage in the climate crisis, the costs of not investing in clean energy projects like Atlantic Shores North are monumental. This project alone will prevent the release of 6.13 million tons of greenhouse gas emissions annually, equivalent to removing 1.21 million cars from the road. Aside from the obvious environmental benefits of curbing greenhouse gas emissions, clean energy projects will also safeguard public health. Shifting away from fossil fuel power plants and toward zero-emission offshore wind turbines translates to cleaner air for New Jerseyans living in historically overburdened communities. Bergen, Mercer, and Camden Counties have reportedly ranked lowest in air quality levels across the state. Offshore wind development is a step toward rectifying public health inequities that have disproportionately burdened communities of color.

Comment Number: BOEM-2024-0008-1108-0013
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

- In discussing general conformity, the EIS should evaluate project emissions associated with the OCS lease area in addition to emissions that occur at staging areas, port facilities, O&M facilities, etc.

Comment Number: BOEM-2024-0008-1108-0014
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

- Emissions associated with vessels should also be incorporated into the EIS. In addition to the commitment to use low sulfur fuel, EPA recommends other mitigation measures such as anti-idling practices and the retrofitting of older equipment and vessels with the cleanest, most efficient technologies to further ensure air quality impacts will be minimal.

Comment Number: BOEM-2024-0008-1108-0015
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

- EPA recommends that the EIS makes clear at the beginning of the AQ section whether the complete vessel routes are included in the AQ analysis.

Comment Number: BOEM-2024-0008-1108-0016
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

- As many of the proposed port locations are located in regions with air quality concerns and EJ communities, EPA recommends the use of best available technology for marine vessels' engines and non-road engines (non-marine engines) powering various equipment and implementation of emission reduction best practices for ports, including vessel speed reduction requirements. For both marine vessels' engines and non-road engines, we recommend exploring the zero-emissions options (electrical/battery operated marine and non-marine engines). If those zero-emissions options are not available, we recommend that Atlantic Shores considers the following: use of plug-in hybrid-marine vessels; 40 CFR part 1042 Tier 3 and Tier 4 certified marine engines, depending on engine size; use of less polluting fuels for marine vessels' engines; use of 40 CFR part 1039 Tier 4 final certified non-road engines, and reducing the use of auxiliary engines while docked through the use of marine shore power systems. More information regarding air emissions reduction methods at ports can be accessed at https://www.epa.gov/ports-initiative

Comment Number: BOEM-2024-0008-1108-0017
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

- As revealed by the Atlantic Shores North COP, the Project will generate significant amounts of air pollution during both construction and operations. For instance, during the estimated 3 years of construction, the Projects will emit 7,297 tons of NOx, 160 tons of VOC, 240 tons of PM2.5, 1,834 tons of CO, 31 tons of SO2, and 507,622 tons of CO2e. During the estimated 30 years of operation, the Project will emit [Footnote 4: The estimated amounts of other air pollutants are significantly lower.] 502 tons per year (tpy) of NOx, and 34,268 tpy of CO2e. These emissions will result mainly from engines on vessels (engines that directly serve the vessels as well as engines of construction equipment located onboard vessels) used to construct and maintain the Projects. A portion of the Project's CO2e emissions will comprise of sulfur hexafluoride ("SF6") emissions. Electrical switchgear equipment that uses SF6 as an electrical insulator will be installed in each wind turbine and each offshore and onshore substation of the Project. The SF6 emissions will be in the form of fugitive emissions from switchgear leaks. As described on the EPA web site [Footnote 5: See additional information at https://www.epa.gov/eps-partnership/sulfur-hexafluoride-sf6-basics], SF6 is "the most potent greenhouse gas known to date. Over a 100-year period, SF6 is 22,800 times more effective at trapping infrared radiation than an equivalent amount of carbon dioxide (CO2). SF6 is also a very stable chemical, with an atmospheric lifetime of

3,200 years. As the gas is emitted, it accumulates in the atmosphere in an essentially un-degraded state for many centuries. Thus, a relatively small amount of SF6 can have a significant impact on global climate change." Given the level of emissions from the Atlantic Shores North Project, EPA suggests the following reasonable alternatives to reduce and minimize the Project's potential impacts on air quality:
- Employ vessels that are able to run their engines on non-fossil fuel, fuels with very low emissions, and/or vessels with air pollution control technologies.
- Use only electrical switchgear equipment that is SF6 free, as there are SF6-free electrical switchgear commercially available (and already in use) for both offshore wind energy project and onshore substations.
In addition to those concerns outlined above, we provide several further comments pertaining to air quality considerations.

Comment Number: BOEM-2024-0008-1108-0003
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

- Additionally, EPA recommends that the EIS include information on the ongoing and long- term risks posed by climate change (such as sea level rise, storm surge, change in coastal currents, severe weather events, etc.) particularly with respect to the infrastructure associated with the Project. As many of the Project components are in potentially vulnerable locations (including floodplains), we recommend the EIS address considerations to increase the resiliency of infrastructure given potential elevated risk of damages due to climate change. This may include a discussion in the main text of the EIS of project design standards meant to withstand changing climate conditions as they relate to WTGs and WTG support structures.

Comment Number: BOEM-2024-0008-1108-0031
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

- The EIS should also explicitly disclose emissions associated with operation of WTGs (for example, to start up WTGs power is extracted from the existing electrical grid) and other project components or facilities that rely on generator engines as emergency backup power.rried out by other north-east wind developer.

Comment Number: BOEM-2024-0008-1108-0032
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

- EPA encourages Atlantic Shores to consider marine vessels electrification projects, similar with other electrification projects carried out by other north-east wind developer.

Comment Number: BOEM-2024-0008-1108-0038
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

- EPA recommends BOEM incorporate an energy substitution analysis and specify the projected changes to the resulting energy mix as energy resources are substituted for one another. Statements suggesting significant reductions in greenhouse gas emissions due to energy substitutions may be overstated as renewables already constitute a large portion of the existing energy mix.

Comment Number: BOEM-2024-0008-1108-0004
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

In addition, we recommend that BOEM address how climate hazards may also affect other critical infrastructure (such as foundations, offshore substation platforms, cables, onshore substations, and ports). In addition to assessing the potential vulnerabilities, the analysis should include potential adaptation measures that could potentially be taken to mitigate those vulnerabilities.

Comment Number: BOEM-2024-0008-1108-0005
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

Climate Change
- EPA recognizes the long-term potential benefits of the proposed large-scale renewable energy project with respect to greenhouse gas (GHG) reductions and climate change mitigation. The COP briefly mentions reductions in annual GHG emissions (roughly 6 million tons of CO2e each year) associated with the Project. The EIS should expand upon this discussion and should provide detailed calculations in support of these estimates.

Comment Number: BOEM-2024-0008-1108-0006
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

- EPA recommends that the EIS also directly discuss implications for climate change impacts (including benefits) associated with the proposed Project. Estimates of the Social Cost of Greenhouse Gases (SC-GHG) allow analysts to incorporate the societal value of changes in carbon dioxide and other GHG emissions into benefit-cost analyses (BCA) of actions that have small, or marginal, impacts on cumulative global emissions. When a BCA is conducted, it is appropriate to use estimates of the SC-GHG that reflect the best available science and methodologies to incorporate the value to society of net changes in direct and indirect GHG emissions resulting from a proposed project (i.e., relative to a no action alternative).

Where it is possible to develop a reasonable estimate of the net change in emissions due to the proposed project, then SC-GHG estimates may be useful for assessing the value to society of GHG changes in the BCA. Additional information on the SC-GHG can be found at: Technical Support Document Social Cost of Greenhouse Gases under E.O.
13990 [Footnote 6: https://www.whitehouse.gov/wp-content/uploads/2021/02/TechnicalSupportDocument_SocialCostofCarbonMethaneNitrousOxide.pdf].

Comment Number: BOEM-2024-0008-1108-0007
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

- As there are Class I areas in proximity to the project area (the Brigantine Wilderness Area), the EIS should incorporate a discussion of consultation with US Fish and Wildlife Service for air permits and should additionally identify mitigation strategies to alleviate potential adverse impacts to air quality in these vulnerable regions.

Comment Number: BOEM-2024-0008-1108-0008
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

Air Quality
EPA Region 2's Office of Air has provided the following comments on BOEM Notice of Intent ("NOI") to Prepare an EIS for the Atlantic Shores North Project - Potential Effects on Air Quality:
- BOEM regulations require that a COP includes air quality modeling and submits to BOEM the modeling report and modeling files to demonstrate that the activities proposed in the COP, or the proposed action (which is the construction and operation of the Atlantic Shores North Project, is in compliance with the Clean Air Act (42 U.S.C. 7409) and its implementing regulations [Footnote 3: See 40 CFR 585.659 "Renewable Energy and Alternate Uses of Existing Facilities on the Outer Continental Shelf /What Requirements must I include in my SA, COP, or GAP regarding air quality."]. However, the Atlantic Shores' COP does not include any plans for submitting the air quality modeling report and files. EPA recommends that the Atlantic Shores COP is updated to include the air quality modeling report and modeling files, prior to the release of the draft EIS for public comment.

Comment Number: BOEM-2024-0008-1108-0009
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

- EPA recommends that BOEM, in the context of preparing an EIS to fulfill its National Environmental Policy Act obligations for the proposed action, determines whether the General Conformity ("GC") Rule (40 CFR Part 93) applies to the direct and indirect emissions of the Projects (which will not otherwise be addressed by the OCS air permit) and ensure that the GC rule requirements that apply in nonattainment and maintenance areas are met.

Comment Number: BOEM-2024-0008-1118-0001
Commenter Type: Advocacy Group
Commenter: Jackie Greger
Organization: Sierra Club

Comment Excerpt Text:

To achieve the necessary carbon emission reductions to protect our communities from the climate crisis, we need a major transition in our energy sector now. There will be 6.13 million tons of GHG reduction annually from this Atlantic Shores project alone, which is equivalent to removing 1.21 million cars from the road. Offshore wind is the future, and one of our greatest clean energy solutions that will benefit the local communities here in our state without the further burning of fossil fuels.

This new clean energy resource will especially benefit the communities in NJ who bear the brunt of pollution, as it will help to displace the fossil fuel usage in our grid and improve our regional air quality, which suffers greatly from a dense population and overwhelming industry pollution. We need to invest in offshore wind to bring relief to people who suffer from asthma, heart disease and other medical conditions. NJ is downwind from all of the states in our regional grid, particularly PA where we see intense tracking, coal mining, and electric generation through coal- and gas-fired power plants. All of this regional pollution lands right here in NJ.

Offshore wind will directly offset our reliance on this dirty energy, allowing NJ communities to breathe easier, and take necessary action toward transitioning toward a clean and livable climate Mure.

Comment Number: BOEM-2024-0008-1124-0002
Commenter Type: Advocacy Group
Commenter: Anjuli Ramos
Organization: Sierra Club

Comment Excerpt Text:

By cutting our fossil fuel reliance, OSW will help alleviate the impacts of climate change statewide. Our communities have already faced the impacts of inland flooding, severe rain and weather events, damaging wildfires and hazardous air quality. Even though these impacts will continue to take a toll in our lives due to the irreversibility of how the climate has already changed, we can prevent them from getting worse. The Atlantic Shores North Project, the largest yet in NJ, is set to avoid approximately 26,000 tons/year of CO2e emissions.

Comment Number: BOEM-2024-0008-1124-0005
Commenter Type: Advocacy Group
Commenter: Anjuli Ramos
Organization: Sierra Club

Comment Excerpt Text:

Furthermore, OSW will also promote public health by improving our regional air quality. Production and combustion of fossil fuels releases dangerous pollutants into the air. These pollutants result in a wide range of health impacts including early death, heart attacks, respiratory disorders, stroke, and exacerbation of asthma.

Comment Number: BOEM-2024-0008-1159-0004
Commenter Type: Advocacy Group
Commenter: Adam Nolan
Organization: New Jersey League of Conservation Voters

Comment Excerpt Text:

It is essential to recognize not only the challenges as well as the benefits. The projected reduction of 6.13 million greenhouse gas emissions annually equivalent to removing 1.2 million cars from the road underscores the substantial positive environmental impact of offshore wind development.

Comment Number: BOEM-2024-0008-1165-0001
Commenter Type: Individual
Commenter: Chris Placitella

Comment Excerpt Text:

Never considered was the effect of hurricanes and Noreasters. In fact, the BPU just filed an official paper saying that it had no scientific basis to support 1,000-foot turbines off the coast of New Jersey, and that they had limited tools to mitigate the risk.

Comment Number: BOEM-2024-0008-1173-0002
Commenter Type: Individual
Commenter: Scott Carlin

Comment Excerpt Text:

There is going to be measurable improvements in air quality as we make this transition to renewable energy and is a way from fossil fuels. Clearly, the wind turbines themselves are not going to dramatically change air quality here but the wind turbines are an integral part in the overall shift in energy strategies.

Comment Number: BOEM-2024-0008-1182-0002
Commenter Type: Individual
Commenter: Lisa Bonanno

Comment Excerpt Text:

I am a nurse, I deal a lot with people with COPD, with people with asthma, adults and children and people with a lot of respiratory problems and this is perpetuating, the more cars we drive, the worse that gets. So there is a lot of public health issues involved with maintaining our dependence on fossil fuels including the effect on the environment. We end up having more storms and more flooding.

So what happens is peoples' homes and properties are dealing with mold and that also impacts asthma and other mold related illnesses, and I don't think that we think about that very much but we should be because, you know, the people that can afford to live in cleaner environments do, and the ones that don't, the people that are on Medicaid, end up costing the state a lot of money and just being sicker, and you know, we need to consider all of this as we look at our fuel sources.

Also I talk to a lot of teenagers, I work in psych sometimes. The teenagers and young adults are demoralized by our inaction on our fossil fuel dependence, they are concerned about the climate change they see, and they talk about not having a bright future. They talk about why have children if we are going to suffer from this, all the wild fires and everything else.

So that's what fossil fuels are indirectly doing. You know, just by the climate change and also the stabilization politically because we have to -- we have to get involved in whatever happens in the middle east and also in Russia because they are oil exporters and we use so much oil. So yes, we have our own and there are impacts to drilling that we can't get away from. There is impacts to our environment and also peoples' health.

Comment Number: BOEM-2024-0008-1191-0001
Commenter Type: Advocacy Group
Commenter: Tiziana Bottino
Organization: Sierra Club

Comment Excerpt Text:

I am actually based in Northern Virginia, but it's important for me to testify for this project today because pollution knows no borders. Climate change is not limited by state lines and therefore I strongly support the environmentally responsible siting and equitable build out of this offshore wind project as more clean energy for structure will help everyone transition away from dirty fossil fuels, reducing the harmful emissions we are all vulnerable to, consequently improving public health by improving our regional air quality.

A.3.2 Alternatives

Comments associated with this issue appear in the sub-issues below.

A.3.2.1. Wind turbines

Comment Number: BOEM-2024-0008-0004-0004
Commenter Type: Individual
Commenter: Noel Quinn

Comment Excerpt Text:
Wave action and very high winds, especially during storms or hurricanes, can damage wind turbines.

Comment Number: BOEM-2024-0008-0068-0002
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

proximity to the shore line - apparently nowhere in the world is there such a large concentration of turbines planned so close to shore - 8 to 10 miles off Long Beach Island while in other locations around the world, the turbines are 25-40 miles offshore. It socially unjust and inequitable to victimize Shore residents, visitors, and local businesses by colonizing the ocean so close to the shoreline.

Comment Number: BOEM-2024-0008-0081-0007
Commenter Type: Individual
Commenter: Patrick Cozza

Comment Excerpt Text:

I would respectively ask for a revisit of the distance placement of the turbines 8 miles off shore, and place them at the same distance from the shoreline no different than the other projects off the NJ coast. I am in

favor of wind energy, but final placement of the turbines needs to be sensitive to the citizens of NJ.

Comment Number: BOEM-2024-0008-0409-0003
Commenter Type: Individual
Commenter: Brian Russo

Comment Excerpt Text:

It is hypocritical for people to be concerned about what the turbines will look like while having no objection to blimps powered with fossil fuels flying over the shore and not supporting speed limits for ships.

Comment Number: BOEM-2024-0008-0457-0001
Commenter Type: Individual
Commenter: Lawrence Cutalo

Comment Excerpt Text:

wind turbines will destroy marine habitat, compress the seafloor, severely damage marine communities, compromise migration corridors for endangered marine mammals, cause commercial fishing stocks to decline, and injure the beach economy. There will be negative impacts on the surf clam industry; the turbines will cause changes to the ocean floor from wind turbine foundations and equipment.

Comment Number: BOEM-2024-0008-0538-0005
Commenter Type: Individual
Commenter: Mary Smith

Comment Excerpt Text:

Turbine gear boxes contain SF6 - the worst of the greenhouse gases. The turbines have not been tested for hurricanes.

Comment Number: BOEM-2024-0008-0611-0010
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

Additionally, since the BOEM has selected to defer its EIS review of its original adoption of the New Jersey lease area to this point, it must now include in that review any alternative areas off New Jersey that can serve its energy market and that are technically an economically feasible for turbine development.

These alternatives provide ample opportunity to meet state program goals. For example there is an estimated 12,057 megawatts of power just in the Hudson south area alone using reasonable turbine spacing.

The BOEM will likely reject this recommendation to opening these alternatives up in this EIS saying they've already decided on the areas and projects to proceed with. So to escape its NEPA responsibility it first argues that it's too early to prepare an EIS on its key decisions and now will argue that it's too late.

But those decisions were not lawful because they were made without proper EIS review and public input. To correct that oversight, the reasonable alternatives above need to be resurrected, placed in this EIS and

reconsidered by the BOEM.

Comment Number: BOEM-2024-0008-0611-0011
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

Within the Atlantic Shores North lease area, the EIS should also present alternative, meaningful turbine number reductions, alternative locations, alternative turbine powers, and alternative gearbox drives, and other meaningful parameters that have environmental differences. The NOI does not present any of that.

Comment Number: BOEM-2024-0008-0611-0005
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

All of these decisions were made without EIS review of wind turbine impact. The BOEM has acknowledged in numerous documents that lease area, turbine number, turbine size, drive, and spacing are environmentally significant factors. Regarding the selection of lease areas, we must remind the BOEM that in its arguments before the Court against preparation of an EIS at the time, it did not dispute the environmental significance of such decisions. Rather, it argued that it was premature to prepare an EIS on that because the agency was not at the point of final decision-making, and within the context of discussing lease areas, it promised to do a full NEPA review at that time. In taking that position, the BOEM has agreed that these prior decisions were not final ones, therefore they must be subject to further review at this last stage to make them final.

But now we are at that point and the agency has changed its position. It states in its current NEPA policy document that for this final stage EIS it will not consider alternative areas, or for that matter significant alternative turbine numbers and sizes from what it is proposing. So now it is saying that those decisions, for example, on lease area, were final. Therefore it appears that the BOEM misled the Court and the public in that proceeding. But the BOEM cannot have it both ways. If those prior decisions were final, then they were unlawful because they had no EIS Review.

In addition to its procedural failures regarding the NEPA, the BOEM winnowing process has failed as a substantive matter. It has resulted in a proposal for large wind large wind turbine projects, both Atlantic Shores South and North, in just about the worst place it could have, the closest to shore of any modern wind project in the world and in the path of migrating whales. While NEPA does not require an agency to choose the environmentally preferable alternative, it certainly didn't intend that agencies choose the worst. Some of those environmental flaws are presented below, which meet the legal criteria for lease area termination, which is another alternative that should be considered in this EIS.

Comment Number: BOEM-2024-0008-0611-0007
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

Regarding what alternatives are, the Biden administration recently adopted new NEPA rules that retained the language in 40 CFR 1502.14 to "evaluate reasonable alternatives to the proposed action" and amended section 1508.1(z) to define reasonable alternatives as "a reasonable range of alternatives that are

technically and economically feasible and meet the purpose and need for the proposed action".

With a clear purpose, knowing the connected actions, and a good definition of reasonable alternatives, the real environmentally distinct alternatives to the proposed action that should be addressed in this EIS also become clear.

Those alternatives include areas previously considered for turbine placement and selected or rejected by the BOEM or selected or rejected by a State Task force and adopted by the BOEM, without any EIS review. They include any technically and economically feasible project proposal that was accepted or rejected by the BOEM, or by a state and that decision adopted by the BOEM, without EIS review.

Those prior decisions were either not final and now subject to EIS review to make them final and lawful under NEPA, or they were final and therefore not lawful under NEPA, because they were made without proper EIS review and public input.

Comment Number: BOEM-2024-0008-0611-0008
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

Specifically the proposed action presentation and the alternatives to the proposed action in this EIS should include:

1. the environmental impacts of the wind energy areas accepted, rejected, or arbitrarily dismissed (see below) by the NJ Renewable Energy Task Force, since the BOEM adopted those conclusions without EIS review,

2. the lease areas in the New York Bight area that were accepted or rejected by the BOEM without EIS review,

3. the prior technically and economically feasible applicant proposals within the BOEM adopted NJ and NY Bight lease areas, that were accepted or rejected by the BOEM without EIS review,

4. the prior technically and economically feasible applicant proposals within the BOEM adopted NJ and NY Bight lease areas that were accepted or rejected by either NJ or NY, including the Ocean Wind, Leading Light and Community Wind projects, since those decisions were accepted by the BOEM without EIS review,

5. within the Atlantic Shores lease area, projects 1 and 2 of Atlantic Shores South themselves are alternatives to the Atlantic Shores North project, and vice-versa, and

6. newly emerged technologies such as floating platform turbines.

Comment Number: BOEM-2024-0008-0622-0004
Commenter Type: Individual
Commenter: Anne Muller

Comment Excerpt Text:

At 8.7 miles off the coast, residents along the shore will have the negative effects of infrasound. To make the statement that these proposed turbines are green energy and moves us away from fossil fuels, is an outright lie. The wind turbines can not exist or function without fossil fuels! Fossil fuels are used in the turbine components construction, installation and required for function. Your agency has stated that placing thousands of wind turbines off the coast will have "negligible" impact on climate change.

Comment Number: BOEM-2024-0008-0633-0013
Commenter Type: Federal Agency
Organization: Mid-Atlantic Fishery Management Council and New England Fishery Management Council

Comment Excerpt Text:

The NOI also notes that the EIS may consider a "visual minimization alternative" which would restrict the height of wind turbines. The EIS should consider that height restrictions would require more, smaller turbines to produce the same amount of energy as fewer, taller turbines. This could result in a greater area of impacted habitat, additional construction work, and other impacts.

Comment Number: BOEM-2024-0008-0656-0003
Commenter Type: Individual
Commenter: Janet Robinson

Comment Excerpt Text:

The wind turbines now being proposed will be taller than all other turbines on the entire planet and closer to shore than anywhere else on the entire planet. Turbines of this size have never been built before. The technology is untested. Why must NJ turbines be 9-10 miles from shore while everywhere else in the world, they are 35 miles or so offshore? Why is NJ the wind farm guinea pig? Experience from existing wind farms shows their unreliability as an energy source. NJ is risking a certain thing, a pristine horizon and a thriving tourist industry, for an unreliable, red ink experiment.

Comment Number: BOEM-2024-0008-0948-0002
Commenter Type: Individual
Commenter: John Caruana

Comment Excerpt Text:

As a recreational boater and fisherman I have spent a considerable amount of time on the waters within view of the Block Island wind farm. It is a joke among fishermen how infrequently they are all actually turning. Sometimes on beautiful breezy days none of them are operational. Reports are that since coming online they have only been operating 30% of the time over the past 5 years. They have had stress cracks in the turbines, underwater cables have been exposed on the beaches, oil leaks into the ocean. And this is a small scale operation close to shore, if this was a test case it failed miserably and should give pause to future projects.

Comment Number: BOEM-2024-0008-1070-0010
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Turbine Selection

We are encouraged that Atlantic Shores North has included suction bucket and gravity based foundations within the PDE, in addition to monopile foundations, and we encourage BOEM to explore these foundation options within the Alternatives Analysis in the Draft EIS. Gravity-based and suction bucket foundations offer significant environmental benefits and flexibility, especially as they do not require pile

driving and therefore avoid the associated noise impacts. [Footnote 18: Our groups are highly supportive of fixed foundation types that significantly reduce noise during installation, including gravity-based foundations, suction buckets (or "caissons"), and jack-up foundations (see, e.g., http://www.windbaseoffshore.com/), and encourage BOEM to incentivize full consideration of these foundations for all fixed-foundation wind energy projects in the United States.] Pile driving noise has been identified as a stressor of high concern for marine wildlife and the health of the broader marine ecosystem. [Footnote 19: "New York State Offshore Wind Master Plan Environmental Sensitivity Analysis. Final Report." NYSERDA Report 17-25. Prepared for New York State Energy Research and Development Authority by Ecology and Environment Engineering, P.C., New York, New York, (November 2017). Available at: https://www.nyserda.ny.gov/-/media/Files/Publications/Research/Biomass-Solar-Wind/Master-Plan/17-25i-Environmental-Sensitivity.pdf.] Sensitivity to the loud impulsive sound that propagates through the water column and substrate from pile driving extends to marine mammals, sea turtles, fish, marine birds, and benthic and pelagic invertebrates, some of which support economically valuable fisheries. Potential impacts of unmitigated exposure to pile driving noise include physical injury, hearing impairment, habitat displacement, stress, disruption of vital behaviors such as feeding, breeding, and communication, and other health effects.

Comment Number: BOEM-2024-0008-1070-0011
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

By entirely avoiding the impact of pile driving noise, the installation of gravity-based or suction bucket foundations represents a 'best practice' in the context of the mitigation hierarchy (avoid, minimize, mitigate) for this impact producing factor. [Footnote 22: IUCN and The Biodiversity Consultancy. "Mitigating biodiversity impacts associated with solar and wind energy development: guidelines for project developers" (2021). Available at: https://portals.iucn.org/library/node/49283.] As developers will not need the same level of noise protection in place, gravity-based and suction bucket foundations may offer the flexibility, when coupled with vessel speed restrictions, to construct year-round (e.g., avoiding seasonal restrictions designed to protect North Atlantic right whale from pile driving noise) in certain regions, and eliminate the need for expensive underwater noise reduction and attenuation technologies (e.g., hydro sound dampers, bubble curtains, etc.). Additionally, best available scientific information indicates that, during the operation phase, offshore wind turbines may generate noise audible and potentially impactful to large whales over significant distances. [Footnote 23: Uwe Stber & Frank Thomsen, How could operation sound from future offshore wind turbines impact marine life?, J. Acoustical Soc'y Am. (Mar. 15, 2021).] Pending further study, we recommend Atlantic Shores North use direct-drive turbines (as opposed to turbines with a gearbox which they have indicated a preference for), [Footnote 24: Atlantic Shores North Construction and Operations Plan, Volume I: at 4-22.] as direct drive turbines may emit lower noise levels and reduce risk of behavioral disturbance or habitat displacement of North Atlantic right whales and other species during the operation phase of development.

Comment Number: BOEM-2024-0008-1148-0001
Commenter Type: Individual
Commenter: Patricia Robertson

Comment Excerpt Text:

And while I prefer no turbines at all in our oceans, I'd like to better understand, what about the topography or seabeds off LBI are so unique, so challenging, so unusual that it is impossible to use

smaller turbines further out as is used in other parts of the world and I am not asking why it's less profitable and perhaps they would produce a somewhat less optimal amount of electricity, but we need to consider the price to be paid by New Jersey.

So I am asking why smaller turbines further out are not possible. Why has Atlantic Shores not been limited on the size of turbines and the miles of shores in accordance with the feedback that's been given

A.3.2.2. Cables and landfalls

Comment Number: BOEM-2024-0008-0004-0001
Commenter Type: Individual
Commenter: Noel Quinn

Comment Excerpt Text:

The production and installation of power cables under the seafloor to transmit electricity back to land can be very expensive.

Comment Number: BOEM-2024-0008-0444-0002
Commenter Type: Individual
Commenter: Theresa Klepczynski

Comment Excerpt Text:

Don't destroy our scallop & flounder habitats. The drilling & laying of cables most certainly will!

Comment Number: BOEM-2024-0008-0444-0003
Commenter Type: Individual
Commenter: Theresa Klepczynski

Comment Excerpt Text:

In addition, we do not want the cables under the sand where our children & grandchildren play!

Comment Number: BOEM-2024-0008-0538-0006
Commenter Type: Individual
Commenter: Mary Smith

Comment Excerpt Text:

Cables buried just 6' under the ocean floor is not wise.

Comment Number: BOEM-2024-0008-0551-0014
Commenter Type: Advocacy Group
Organization: RODA

Comment Excerpt Text:

The EIS should evaluate a range of burial depths and monitoring techniques. Array design and spacing between turbines are fundamental determinants of the future, or lack thereof, of commercial fishing operations within wind development areas. It is extremely important that interarray and export cables are buried to sufficient depths to reduce the risk of fishing gear interactions. The fishing industry has

consistently requested this to be a minimum of 8-10 feet to avoid interactions; if a shallower depth is permitted, it must be paired with remote monitoring to ensure the cable remains sufficiently buried at all times. BOEM must provide clear standards as to what this depth is, how it is determined, and monitoring protocols to ensure there are no future interactions. Moreover, the project layout should be designed to minimize instances where cables transect fishing tow areas.

Introduction of electromagnetic fields from numerous, and potentially gridded, OSW power cables may have impacts to not only benthic species, but migrating and other electric and magnetic field- sensitive species, including sea turtles, marine mammals, and elasmobranchs. Cables carrying electric current may disrupt migrations of fish and other marine animals reliant on magnetic cues for orientation and navigation, but research has only just begun on this topic [Footnote 14: See Klimley, A. Peter et al., A call to assess the impacts of electromagnetic fields from subsea cables on the movement ecology of marine migrants, Conservation Science and Practice, May 22, 2021.].

It is extremely important to consider impacts from inter-array and export cables for all species found in the lease area. The EIS must analyze impacts from installation (including the duration of impacts after installation) and impacts from the cables themselves. The COP identifies a target burial depth of between 3 to 7 feet, depending on seabed conditions. The fishing industry has consistently requested cables be buried as deep as possible, generally at a minimum of 8-10 feet. below the seabed. If these depths cannot be achieved, at a minimum BOEM must require developers to work directly with the fishing industry to design cable protection methods that are as compatible (as possible) with fishing practices.

The amount of cable used should be minimized to reduce risk of hanging up by fishing gear. The proposed layout has up to eight substations in the layout which may result in increased challenges for fishing vessels trying to operate within the WEA while avoiding towing over cables.

Comment Number: BOEM-2024-0008-0572-0003
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

Having electric cables buried under the ocean floor is no guarantee that won't come to the surface and be exposed.

Comment Number: BOEM-2024-0008-0581-0009
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

many beach areas are impacted with cables effecting the electronic charge in the sand and ground surrounding relay areas to the turbines from the land.

Comment Number: BOEM-2024-0008-0633-0015
Commenter Type: Federal Agency
Organization: Mid-Atlantic Fishery Management Council and New England Fishery Management Council

Comment Excerpt Text:

We support efforts to avoid impacts to submerged aquatic vegetation (SAV) and other structured habitats

along the cable route and to avoid impacts to areas designated by the Councils as Habitat Areas of Particular Concern.

Comment Number: BOEM-2024-0008-0928-0014
Commenter Type: State Government
Organization: NJDEP

Comment Excerpt Text:

Cable installation depth is another example of a need for more preconstruction data and impact analysis. With the volume of research that is being published and conducted, it is important to make every attempt to provide evidence that supports the selection of mitigation measures, and monitoring during and post construction should evaluate their success in reducing impacts.

The regulatory requirements for an environmental analysis for onshore and offshore transmission cables are similarly uncertain. Projects plan their cable corridors very early in development, and changing those routes may be prohibitively expensive. A detailed cable impact assessment should be completed before the route is finalized, with input from the NJDEP and NOAA. The update of New Jersey's Strategic Plan that is currently underway includes a cable constraints analysis that is expected to be available Q4 2024 and should be used to inform the impact analysis for the export cable.

Comment Number: BOEM-2024-0008-0928-0005
Commenter Type: State Government
Organization: NJDEP

Comment Excerpt Text:

Transmission

The NJ Board of Public Utilities (NJBPU) has pursued an approach to coordinate the construction of offshore wind transmission cables by developing common infrastructure that will house power cables in shared underground transmission corridors. During NJBPU's third solicitation, there was a requirement to make landfall at a pre-designated location in Sea Girt, New Jersey, and to connect the power to the Larrabee substation in Howell, New Jersey. It is possible that future NJBPU solicitations may have similar requirements and pre-designated interconnection points. Should ASOW choose to participate in a future NJBPU solicitation, there may be a requirement to use a shared transmission cable corridor and interconnection point. This may have an effect on the development of ASOW's cable corridors. NJDEP encourages BOEM to incorporate the review of the coordinated transmission solutions into the NEPA review and project timeline to the extent practicable.

Comment Number: BOEM-2024-0008-1069-0016
Commenter Type: Advocacy Group
Organization: Clean Ocean Action

Comment Excerpt Text:

AC power does not travel well via undersea cables further than thirty miles offshore, so projects sited further from shore must convert AC to DC through an HVDC substation, which requires a cooling system and produces higher electromagnetic fields which could affect electrosensitive species.

Comment Number: BOEM-2024-0008-1077-0001
Commenter Type: Individual
Commenter: Steve Smith

Comment Excerpt Text:

While attending one of three in-person meetings in Asbury Park, one of your posters stated cables to be buried 6.5' deep. Are you aware the block island cables were buried approx. the same depth and now they have to be reset because scouring forces have exposed them. While the work is completed huge barge mounted diesel generators will be used to provide power to residence. It's so outrageously dumb.

Comment Number: BOEM-2024-0008-1095-0004
Commenter Type: Individual
Commenter: Michael Mason

Comment Excerpt Text:

The cables running through the water and up the beaches are going to deter most from visiting our beaches.

Comment Number: BOEM-2024-0008-1106-0022
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

Offshore Export Cable Route Alternatives
We recommend an alternative be included in the EIS that considers avoidance and minimization of impacts to resources of concern (as described above) along the export cable route. In particular, any seabed preparation, installation, or cable/scour protections proposed should avoid impacts to prime fishing areas and other ecologically sensitive habitats present along or near the proposed export cable route such as complex habitat areas (e.g., boulder fields, biogenic habitats [hard clam habitat], ridge and trough complexes). For example, the segment of export cable proposed within the New Jersey state waters of Raritan Bay is located within high density hard clam habitat [Footnote 7: See https://gisdata-njdep.opendata.arcgis.com/maps/3f716258e7244ff3b536d1439d382add/about] and a clam fishery operates here [Footnote 8: See information on harvesting in restricted waters for depuration https://dep.nj.gov/wms/bmw/national-shellfish-sanitation-program-nssp/#permits]. Additionally, large portions of the export cable appear to overlap with extensive, dense boulder fields. Ocean disposal sites should also be avoided. We recommend BOEM engage with us as soon as possible to use available survey data to scope out specific routing alternatives and/or mitigation measures to avoid these areas.

Comment Number: BOEM-2024-0008-1106-0023
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

Alternatives for the export cable route may include modifications or expansions of the cable corridors to ensure cables can be routed around complex and sensitive habitats. Measures to avoid impacts to sensitive habitats within the proposed utility corridors/easements should also be considered. This alternative should also evaluate methods used to lay the cable within, or adjacent to, complex habitats along the export cable route, as well as measures to avoid and minimize adverse impacts from installation of scour protection.

Options for avoiding and minimizing impacts related to the methods of construction and routes that allow for full cable burial to minimize permanent habitat impacts and potential interactions with fishing gear, should be also considered. Habitat impacts in any area with SAV should be avoided because SAV is designated as HAPC for summer flounder.

Comment Number: BOEM-2024-0008-1106-0024
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

Coordinated Cable Routing
Where routing and landfall is anticipated in the Raritan Bay, Lower Bay, and New York Harbor region, export cable routing alternatives that use common corridors with adjacent projects should be evaluated and discussed. We recommend BOEM develop common cable corridors and landfalls for developers to use to both increase efficiency and predictability and reduce resource impacts.

Comment Number: BOEM-2024-0008-1111-0010
Commenter Type: Advocacy Group
Commenter: Jack Fullmer
Organization: New Jersey Council of Divers and Clubs

Comment Excerpt Text:

Of even more concern is the extreme length of the export cables that will go to NY, the solid rock reefs it almost certainly will encounter north of Asbury Park, and the complkated grid pattern from the planned NY Bight export cables that will apparently cross over these export cables. Extensive rock areas such as the Takanessee Fault, the Shewsbury Rocks, the Long Branch Rocks and other natural rock areas further out could make cable laying a formable task. These are not just occasional boulders, but solid rock reefs in a number of areas that we dive closer to shore. On page 4-44 mention is made of only attempting to bury the cable 31 inches (less than 3 ft) by displacement plow in these rock areas, not a safe depth for anchoring of party or charter boats that fish these areas.

Comment Number: BOEM-2024-0008-1111-0011
Commenter Type: Advocacy Group
Commenter: Jack Fullmer
Organization: New Jersey Council of Divers and Clubs

Comment Excerpt Text:

As the export cable approaches NY harbor, shipwrecks become more frequent and the chance of encountering one more likely. I somehow get the impression that the route of these cables is not finalized yet, and because the coordinates for the export cables are not given in the DEIS, no one can say for sure if any wrecks are actually in their path. I would think a valid DEIS should have a finalized route.

Comment Number: BOEM-2024-0008-1111-0012
Commenter Type: Advocacy Group
Commenter: Jack Fullmer
Organization: New Jersey Council of Divers and Clubs

Comment Excerpt Text:

An export cable that runs parallel to the coast all the way from South Jersey to New York City or Staten Island (90.4 miles to its farthest reach) would also create a grid problem with at least 4 or 5 export cables from the planned six wind turbine areas of the NY Bight crossing the two Atlantic Shores export cables. This would create a nightmare grid for trawlers and scallop dredges who would fear snagging improperly buried cables. Would it make more sense for BOEM to require a single large capacity parallel cable with tie-ins to the on-shore substations that all the future wind farms of the NY bight could feed directly into with designated areas projecting from the bottom for tie-ins to avoid a proliferation or mishmash of cables going in all directions and crossing each other to reach the on-shore substations. I am not an electrical engineer and do not know what problem u/w tie-ins could pose.
Perhaps all the planned wind farm areas could help pay for this large capacity cable, but this would avoid proliferation of extremely long export cables all going to some on-shore electrical station.

Comment Number: BOEM-2024-0008-1111-0004
Commenter Type: Advocacy Group
Commenter: Jack Fullmer
Organization: New Jersey Council of Divers and Clubs

Comment Excerpt Text:

Why are the shipwrecks inadequately protected? The first reason has to do with a SO-meter buffer zone that is woefully deficient. Some of the cable laying motorized barges may be 300 or more feet long with limited maneuverability, and expecting a barge that size to lay cable within an area that is half as long as the barge itself is not realistic. The old wooden wrecks are often hit by commercial trawlers and scallopers, torn apart, with a large debris field. Hard to detect wooden wreckage may be buried just a foot or so under the surface, so cables laid within 50 meters would not be buried to the required depth, although the wreckage may not show with side-scanning or mag equipment. The buffer zone needs to be at least I00 meters. Furthermore, large construction vessels with anchor lines several hundred meters long are also a likely threat to these wreck reefs.

Comment Number: BOEM-2024-0008-1111-0006
Commenter Type: Advocacy Group
Commenter: Jack Fullmer
Organization: New Jersey Council of Divers and Clubs

Comment Excerpt Text:

What really concerns me is that an electrical cable might be accidentally laid over the debris field of a low-lying wood or metal wreck. Wrecks are intensely fished and dived on, and party, charter, and private boats will anchor with a lot of line out and sometimes with two anchors so that the boat can maneuver over the wreck by adjusting the lines. The anchor ropes could extend several hundred feet past the wreck. Dive boats will often throw a grapple upwind of a wreck and let it drag into the wreck. As a diver, I have seen wrecks uncover over 4 feet, and the area near a wreck can uncover due to scouring.
What would happen if an electrical cable laid near a wreck was improperly buried or uncovered and an anchor or grapple hook snagged it? For anchoring reasons alone, it would be advisable to have at least a l 00-meter buffer zone around any surveyed wreck or artificial reef, and even that may not be adequate.

Comment Number: BOEM-2024-0008-1169-0002
Commenter Type: Local Government
Commenter: Justin Macko
Organization: Borough of Sea Girt

Comment Excerpt Text:

One of the most significant concerns that we have for this project centers on the potential use of the National Guard training center located in the Borough of Sea Girt as the location in which the wires would enter the land. The specific area in which they would reach landfall and we have been identified as the landing site that we have seen in all the bids is currently in a designated area for endangered piping plovers, oyster catchers and sea beach ameryth. The DEP has sought to protect the endangered species in this area in which they nest. The disruption will be caused and bringing the wires on shore will eclipse any activities that the DEP has previously expressed concerning these things.

Comment Number: BOEM-2024-0008-1169-0003
Commenter Type: Local Government
Commenter: Justin Macko
Organization: Borough of Sea Girt

Comment Excerpt Text:

Once the wires come onto the beach, the proposals that we have seen, and we have met with several of the on shore bids that was just submitted on April 3 to the BPU, those wires and conduits, the cable bolts, and duct banks would run through the Borough streets. The Borough strenuously objects to this. Our infrastructure is effected and the access to our infrastructure that could be impacted. Moreover it is highly disruptive to our citizens living nearby. Several of the proposals put some of the duck banks three to five feet from peoples' homes and property lines, and in these conversation we have learned that these wires can go up to 90 degrees Celsius or 194 degrees Fahrenheit at a depth of five feet.

A.3.2.3. Project relocation

Comment Number: BOEM-2024-0008-0065-0001
Commenter Type: Individual
Commenter: Patrick Cozza

Comment Excerpt Text:

8 miles off shore and the closest largest wind farm in the US? Are you kidding? I'm all for wind power but let's put them the same distance off shore as all of the others in the NJ area, 35 miles. And to think some/all of the power generated is not for NJ residents, but for NY residents!

Comment Number: BOEM-2024-0008-0066-0003
Commenter Type: Individual
Commenter: Robert Ankosko

Comment Excerpt Text:

Adding insult to injury is the plan to ship electricity to points far north of the Atlantic Shores North site, including the New York metropolitan region 50-some nautical miles north of the site. Are you kidding? The LBI resort and surrounding communities would bear the brunt of this invasive boondoggle, one that would use aging technology to achieve aggressive renewable energy goals set forth and being greatly

subsized by government entities.

Comment Number: BOEM-2024-0008-0069-0003
Commenter Type: Individual
Commenter: Virginia Murray

Comment Excerpt Text:

And the latest slap in the face is that the power generated will not even sustain those communities which will; be most directly impacted, but sent up to NY!

Comment Number: BOEM-2024-0008-0139-0002
Commenter Type: Individual
Commenter: Anthony Hagen

Comment Excerpt Text:

Finally, some have suggested that the Atlantic Shores wind turbine development project stretches too close to the New Jersey coastline -- 9 miles at its closest point. I suggest some modification in the plans to push those turbines further out to sea, although the priority is to approve the larger plan as laid out by Atlantic Shores and expeditiously move this through the permitting and construction process.

Comment Number: BOEM-2024-0008-0150-0003
Commenter Type: Individual
Commenter: Denise Brush

Comment Excerpt Text:

I do feel that the plan to site Atlantic Shores as close as 9 miles from shore is unwise. All the other proposed offshore wind projects are much farther from shore. I would like BOEM to consider asking the developers to modify their proposed plan to move it closer to 30 - 40 miles offshore.

Comment Number: BOEM-2024-0008-0485-0003
Commenter Type: Individual
Commenter: E. Robb

Comment Excerpt Text:

If this project is allowed to proceed it MUST be located 30 to 40 miles out to sea where other turbines have been installed and are not visible.

Comment Number: BOEM-2024-0008-0489-0002
Commenter Type: Individual
Commenter: j. m.

Comment Excerpt Text:

Put them in the pine barrens not off our shore resort towns.

Comment Number: BOEM-2024-0008-0494-0001
Commenter Type: Individual
Commenter: Veronica Saunders

Comment Excerpt Text:

The wind farms off of Long Beach Island need to be moved further out! You have all the information to make the right decision

Comment Number: BOEM-2024-0008-0558-0001
Commenter Type: Individual
Commenter: Tony Moutinho

Comment Excerpt Text:

I have lived at the coast for years and am an avid sportsman. As a sportsman, I have been active in following fishing regulations and protecting the environment. I am also a supporter of all fuels...wind, solar, fossil and nuclear.
I believe the project to put windmills in the ocean is a solution/alternative being constructed in the wrong area.

Comment Number: BOEM-2024-0008-0558-0004
Commenter Type: Individual
Commenter: Tony Moutinho

Comment Excerpt Text:

Put the windmills on land.

Comment Number: BOEM-2024-0008-0559-0004
Commenter Type: Individual
Commenter: Gina Cobianchi

Comment Excerpt Text:

Please reconsider this 'check-the-box' energy project, but if it must be slammed thru, consider pushing the turbines way out to sea where they (hopefully) would do the least amount of harm to all living things.

Comment Number: BOEM-2024-0008-0569-0009
Commenter Type: Individual
Commenter: Craig Osten

Comment Excerpt Text:

Finally I have not gotten a clear answer from anyone as to why this project, as unviable as it appears to be, needs to be done 9 - 13 miles from our shoreline. While I am not sure moving them back (35 to 40miles) eliminates many of the objections I have noted above, including wildlife and economic impacts, it certainly seems incongruous that these turbines have to closer to the shore line than any where else of note in the world, other than a more profitable project for the already subsidized Atlantic Shore company. Please do not allow our NJ shore to be industrialized with this untested, economically unviable project.

Comment Number: BOEM-2024-0008-0579-0001
Commenter Type: Individual
Commenter: Daneen Osten

Comment Excerpt Text:

Why should LBI have to deal with the world's largest turbines and the largest turbine field all within sight lines of LBI and inland. IF the project proceeds in any way, it needs to be 30-40 miles off shore like other turbine fields. The location needs to be re-evaluated - during one of the BOEM forums you said the location had been determined in 2010!

Comment Number: BOEM-2024-0008-0611-0053
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

The BOEM has excluded any alternatives that proposed a different location, are smaller in scale, or have less environmental impact. Therefore the proposed EIS would fail to study, develop, or describe reasonable alternatives to the proposed Project outside and inside of the Project area that would avoid, minimize, reduce, and compensate for the environmental impacts of the Project as the law requires.

Comment Number: BOEM-2024-0008-0651-0004
Commenter Type: Individual
Commenter: Elizabeth Quattrochi

Comment Excerpt Text:

Site location: Not the best science: The East Coast is one of the most biodiverse, if not the most biodiverse, migratory corridors in the world. Best practice is not to build renewable energy in the migratory path of endangered species. You know this.

"A critical step prior to construction of new energy infrastructure is ensuring that projects are not located in the most sensitive area for migratory species." State of the World's Migratory Species Such is considered a "no-go" unless it can be fully mitigated.

Comment Number: BOEM-2024-0008-0653-0004
Commenter Type: Individual
Commenter: Michael Devlin

Comment Excerpt Text:

2. Adopt consistent exclusion zones.
Declare zone OCS-A 0549 an exclusion zone. This will be consistent with distances and exclusion zones offshore for other states such as New York and Massachusetts.

Comment Number: BOEM-2024-0008-0761-0019
Commenter Type: Individual
Commenter: John Deputato

Comment Excerpt Text:

Look for locations that are 40 miles off the coastline and preserve New Jersey's most treasured resource.

Comment Number: BOEM-2024-0008-0772-0003
Commenter Type: Individual
Commenter: Jay Hutchinson

Comment Excerpt Text:

It appears to me that the Long Beach Island community, as well as the entire shore along coastal New Jersey will be negatively impacted by this project and I, and my family, are requesting that this project be reviewed and cancelled and that a different proposal indicating a much more distant turbine placement area with less on-shore infrastructure be proposed in its place. In closing, I would like to once again reiterate that, with the current parameters of this project, I am NOT in favor of it's approval or continuance.

Comment Number: BOEM-2024-0008-0801-0001
Commenter Type: Individual
Commenter: Sucheta Madhukar

Comment Excerpt Text:

Please can you move the wind farm 30 miles away from the ocean ? We love going to LBI would love the shore to remain as is !!

Comment Number: BOEM-2024-0008-0806-0001
Commenter Type: Individual
Commenter: George Saul

Comment Excerpt Text:

These windmills should not be so close to the coast. They will degrade the view and affect tourism, thereby damaging employment for people. Move the windmills further out.

Comment Number: BOEM-2024-0008-1033-0001
Commenter Type: Individual
Commenter: Richard Feldgus

Comment Excerpt Text:

I strongly oppose the Atlantic Shores North project as currently proposed. I see no justification for placing 157 wind turbines in close proximity to Long Beach Island (8 miles) when other sites are available. I believe that BOEM has failed to properly consider the impact that these mammoth wind turbines will have on the well being of the residents and businesses that are currently on Long Beach Island as well as the mainland communities that are within 10 miles of the Island.
Moreover I believe BOEM has failed to conduct a proper assessment of the placement of these wind

turbines further from the Island, so as to not affect the well being of residents and businesses.

The size and proximity of the wind turbines to land will have a major impact on tourism, property values, business economics and the health and welfare of all people on Long Beach Island New Jersey and the surrounding mainland areas. The noise, vibrations and visual pollution caused by having the thousand foot high structures so close to land can not be justified by any cost benefit analysis or environmental impact study.

Comment Number: BOEM-2024-0008-1034-0001
Commenter Type: Individual
Commenter: Lisa Zangara

Comment Excerpt Text:

There are known detrimental impacts to marine life, noise pollution, and of course the aesthetics, which will diminish the enjoyment of the ocean views, which ultimately impact homeowners' property values. These concerns are more pronounced with the Atlantic Shores North project given how close the turbines will be to the shoreline. The reverberations will cause discomfort or perhaps worse impacts to both humans and pets. The dead marine life will create other environmental issues so close to the coastline. Proceeding with the Atlantic Shores North turbines well permanently harm fishermen's livelihoods, wildlife, and financially impact homeowners with real estate along the coast and related resort communities' businesses. More remote locations should be explored.

Comment Number: BOEM-2024-0008-1068-0001
Commenter Type: Individual
Commenter: Denise Weinberg

Comment Excerpt Text:

I do not object to wind energy. However, this proposed project would be the tallest and closest to shore modern wind turbine complex in the entire world. I consider it experimental and detrimental to my community. For this reason, other states have laws in place to reject wind turbines proposals this close to the shoreline. A solution for the LBI project would be use of the Hudson South Call Area, 35 miles from the coastline.

Comment Number: BOEM-2024-0008-1088-0006
Commenter Type: Individual
Commenter: Mary O'Keeffe

Comment Excerpt Text:

At a minimum move the turbines out 50 miles as they will be in the NY project.

Comment Number: BOEM-2024-0008-1094-0005
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

Segregation of lease area for two projects was unlawful.

Comment Number: BOEM-2024-0008-1096-0002
Commenter Type: Individual
Commenter: Teresa Boyle-Vellucci

Comment Excerpt Text:

While we appreciate the concern and need to address climate change, the proposed plan is not the way to address this. We are asking the BOEM to consider, the alternative of moving move the wind farm to another location or at a minimum out beyond 35 miles from the shoreline.

Comment Number: BOEM-2024-0008-1126-0001
Commenter Type: Individual
Commenter: Barbara Sommer

Comment Excerpt Text:

My family has had a residence on Long Beach Island for 60 years. I have a question on this project that I don't understand and I have asked of many people throughout the process and no one seems to have an answer which is why is the project cited eight miles off of our beautiful coast line and why cannot it be moved further out like other projects? For example, 40 miles, 20 miles, some other amount of distance other than being the closest anywhere in New Jersey and probably the United States.

Earlier our Atlantic Shores person said they are willing to consider reasonable alternatives, and also made a comment that none of the turbines would be closer than 12 miles. Well, it seems like they keep creeping closer because originally they were supposed to be further out as another call in person said, a speck on the Horizon, they are certainly not going to be a speck at eight miles out.

And I think everyone in New Jersey deserves an answer to this question. If it's about economics, then, sure, I guess we would have to understand that, but no one has answered it

Comment Number: BOEM-2024-0008-1127-0002
Commenter Type: Individual
Commenter: Brad Williams

Comment Excerpt Text:

The no surface occupancy zone shall also be in accordance with the recommendations given in the lease 549's technical report entitled Seascape, Landscape, and Visual Impact Assessment section 3.2, page 27.

Comment Number: BOEM-2024-0008-1127-0003
Commenter Type: Individual
Commenter: Brad Williams

Comment Excerpt Text:

My proposed action plan would be to establish a no surface occupancy zone within the distance from shoreline established by that aforementioned study, effectively mitigate the visual impacts of the wind turbine generators on both property values and the regional recreation tourism economy within the project view shed.

Comment Number: BOEM-2024-0008-1147-0002
Commenter Type: Individual
Commenter: James Wolf

Comment Excerpt Text:

I have been lucky enough over the last few years to be fishing off of the shore of the southern part of Long Beach Island, Little Egg Harbor outlet, six miles out, and almost every day that I am out there, I can see the wind turbines in the bay of Atlantic City, that's six miles out and these are severely smaller than what's being proposed so the idea that you might not be able to see it on any given day, I just don't buy it.

You are looking at the best available science. Have you looked at 35 miles out and done some kind of comparison as to what the energy that would be produced would be compared to the eight and a half miles. Is it less detrimental to the marine life or more?

Comment Number: BOEM-2024-0008-1157-0002
Commenter Type: Individual
Commenter: John Deputato

Comment Excerpt Text:

So I am concerned about climate change but I am also concerned about -- about how these turbines are being installed, they are a thousand feet tall, they are as big as the Chrysler buildings and I had a conversation with Governor Murphy probably a year ago on a call in station, in fact I spoke to him twice. In the first time I spoke to hi he said mere specs on the horizon, and the second time he said we just have to get used to them. I can tell you the people of Long Beach Island don't want to get used to these things. There is plenty of opportunity to move these turbines out 40, 50 miles out like they are in Europe. So if you go and review where the turbines are placed in Europe, you will see that they are not placed anywhere near shore.

So again, very concerned about it, and I would like to see BOEM take action to be able to place these turbines in an area that does not effect tourism or home values or just change the scope and the landscape of Long Beach Island for eternity, thank you for your time.

Comment Number: BOEM-2024-0008-1168-0001
Commenter Type: Individual
Commenter: Daneen Osten

Comment Excerpt Text:

When we tell our friends about this project that aren't from the area that don't know about it, they are absolutely flabbergasted and say why would anybody do this. The cons of this project are so much worse than the benefits of the turbines especially considering the lack of testing. I don't understand why the government wants to install the world's largest turbines and turbine field off the coast of one of New Jersey's best beaches.

Please cancel this project, at the very least you have to push them out 30 to 40 miles, there has to be a better way, we won't give up without a fight. Thank you for letting us talk. Thank you.

A.3.2.4. Habitat Impact Minimization

Comment Number: BOEM-2024-0008-0551-0012
Commenter Type: Advocacy Group
Organization: RODA

Comment Excerpt Text:

Alternatives should be developed specifically to address impacts to fisheries. This includes site assessment and project design principles specifically adopted to reduce impacts to fishing, important fisheries habitats, shoreside businesses and seafood-dependent communities. Several opportunities exist at this stage even if BOEM continues its typical leasing process, including seasonal restrictions on site characterization activities, improved notification processes for hazards, whistleblower provisions for protected resource interactions, clear criteria or thresholds for what level of conflict should preclude OSW development, and many more actions RODA and fishing industry members have suggested to the agency..

Comment Number: BOEM-2024-0008-0633-0014
Commenter Type: Federal Agency
Organization: Mid-Atlantic Fishery Management Council and New England Fishery Management Council

Comment Excerpt Text:

The NOI also notes that BOEM may develop a "habitat and fisheries minimization alternative" to reduce impacts to habitat and fisheries. We strongly support project modifications to reduce negative impacts to habitats and fisheries. We urge BOEM to work closely with NOAA Fisheries to consider the most appropriate fishing and habitat data and other considerations to inform the alternatives and associated mitigation measures. However, we recommend that BOEM not use the term "minimization" when describing such alternatives. Depending on the final parameters of the alternatives, impacts to habitat and fisheries may be reduced, but we have not seen prior examples of alternatives developed by BOEM that truly minimize these impacts. We are concerned that the term "minimization" may be misleading in this context, implying that no additional project restrictions or other mitigation measures are needed.

Comment Number: BOEM-2024-0008-0633-0029
Commenter Type: Federal Agency
Organization: Mid-Atlantic Fishery Management Council and New England Fishery Management Council

Comment Excerpt Text:

The EIS should consider buffers around artificial reefs in which no construction activities would take place. Additional conversations with state and federal fishery managers and the fishermen who use these locations are necessary to inform these considerations and to determine the appropriate buffer distance. Some of these conversations were initiated during development of the Atlantic Shores South EIS; however, those considerations and analyses should be more thoroughly developed.

Comment Number: BOEM-2024-0008-0633-0005
Commenter Type: Federal Agency
Organization: Mid-Atlantic Fishery Management Council and New England Fishery Management Council

Comment Excerpt Text:

BOEM should consider how to best reduce the negative impacts of the project on habitats and fisheries. However, we no longer support use of the term "minimization" to describe alternatives which aim to achieve this goal.

Comment Number: BOEM-2024-0008-0633-0006
Commenter Type: Federal Agency
Organization: Mid-Atlantic Fishery Management Council and New England Fishery Management Council

Comment Excerpt Text:

BOEM should work closely with NOAA Fisheries to identify appropriate fishing and habitat data to use when informing alternatives development and any potential impacts and mitigation measures needed.

Comment Number: BOEM-2024-0008-0633-0007
Commenter Type: Federal Agency
Organization: Mid-Atlantic Fishery Management Council and New England Fishery Management Council

Comment Excerpt Text:

Setbacks and other restrictions should be considered to reduce the negative impacts of construction activities on important fishing areas, including artificial reefs.

Comment Number: BOEM-2024-0008-0647-0006
Commenter Type: Federal Agency
Organization: FWS

Comment Excerpt Text:

The Service recommends that the BOEM includes an alternative within the EIS that will (as possible) incorporate measures to monitor, avoid/minimize, and/or mitigate for bird and bat collisions. BOEM should coordinate with the offshore wind developer to review/create designs, technologies, and scientific data to develop this alternative. The Service recommends reviewing/considering the following while developing this alternative:

Comment Number: BOEM-2024-0008-0928-0013
Commenter Type: State Government
Organization: NJDEP

Comment Excerpt Text:

Since lessons from the ASOW South project should inform the ASOW North project, it would be useful to review the decision-making regarding siting of structures. There were concerns about avoiding the peaks and troughs of sand waves, and MRA supported the micrositing of turbines away from those

features. That seemed reasonable and logical, however there is evidence that the sides of sand waves may be the more productive habitat (pers. com. from Thomas Grothues, Rutgers University). There were concerns about possible impacts to artificial reefs, and whether avoiding the reefs might affect project feasibility. Avoidance of specific high-value habitats, including artificial reefs, clam beds, and bathymetric features like sand waves that create prime fishing areas can only be effective if those habitats are identified early enough in project development to avoid them. Maps need to identify sensitive benthic habitats, and when information gaps exist (e.g., the surfclam stock that exists in lease areas), they should be identified. Additionally, surfclam surveys in the lease area are essential.

Comment Number: BOEM-2024-0008-1106-0016
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

Recommended Alternatives for Evaluation in the EIS
The "Alternatives" section of the EIS should consider and evaluate a broad range of reasonable alternatives to the proposed action, including one or more reasonable alternatives that avoid adverse effects to environmental resources including NOAA trust resources, and the fishing communities that depend on them, with subsequent minimization techniques where avoidance is not possible. Avoidance and minimization of resources and fishing operations identified above must be fully considered through the alternatives development process. These alternatives should be developed based on their potential to achieve a meaningful reduction in impacts on resources, rather than designing alternatives to meet engineering needs which may have some incidental resource benefit. Additionally, any alternatives developed to reduce resource impacts should not solely consider benefits already likely to be achieved through mitigation requirements (e.g. micrositing). Given the scope of the PDE for this project, we recommend BOEM consider a broad enough range of alternatives such that should any new information arise during the NEPA process that affects the feasibility of certain construction scenarios, the EIS would still contain a reasonable range of alternatives. Based on the resources in the Project area described above, we recommend the following alternatives be considered in the Atlantic Shores North EIS:
Lease Area Alternatives

Comment Number: BOEM-2024-0008-1106-0017
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

The existing seabed in the lease area is characterized by high fish production, species diversity, and benthic faunal density resulting in part from the occurrence of a mosaic of complex hard and soft bottom sediments and benthic features. We recommend BOEM develop and analyze reasonable alternatives that avoid or substantially lessen one or more effects to NOAA trust resources and existing fishery operations in the lease area. Alternatives (or sub-alternatives) we recommend be considered in the lease area include: (1) removal and/or relocation of WTGs, OSSs, Met Towers, and inter-array cables in portions of the lease area that overlaps with concentrations of marine resources and fisheries; (2) relocation of the OSS(s) to an identified WTG foundation location(s) to achieve a consistent alignment of project structures; (3) requirement of closed-loop cooling systems for any HVDC converter station(s); (4) minimization of habitat conversion through selection of a cable layout; and (5) required selection of a foundation type that results in the least amount of adverse impacts to NOAA trust resources from construction and operation, including consideration of noise impacts and/or entrainment effects during construction as well as permanent impacts from substrate modification (including bedform removal/flattening), and combined

scour protection and foundation impact footprint [Footnote 5: When assessing (quantifying) direct benthic impacts of WTG foundations, we recommend using the following two categories: "footprint area total (with scour protection)" and "footprint area (WTG only)," which is consistent with previous EIS' and EFH assessments.].
This would involve, for example, identifying and addressing the risks of foundations that do not require pile driving (e.g., suction bucket foundations) but require pumping of water during installation and may require additional seabed preparation and have a larger footprint.
Development and analysis of these technically and economically feasible alternatives (that also meet the purpose and need for the proposed action) that avoid or substantially lessen impacts to NOAA trust resource and existing fishery operations will ensure a comprehensive suite of environmental impacts are appropriately considered.

Comment Number: BOEM-2024-0008-1106-0018
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

We recommend BOEM include an alternative that avoids and minimizes impacts to areas of high concentrations of surfclams (i.e., highly productive habitat areas) and associated fishing operations. Available data (see Figures 1-3 in Attachment B), including similar figures in the COP based on data submitted by the fishing industry, indicate that certain areas within the project area contain high concentrations of surfclams and associated fishing activity, particularly by the fishing fleet out of Atlantic City [Footnote 6: See data layers available on the Northeast Ocean Data Portal (https://www.northeastoceandata.org/data-explorer/) and our fishery socioeconomic impact report for this lease area at
https://www.greateratlantic.fisheries.noaa.gov/ro/fso/reports/WIND/WIND_AREA_REPORTS/com/OCS_A_0549_Atlantic_Shores_North_com.html]. Such an alternative should consider the elimination and/or relocation of WTGs, OSS, Met Towers, and inter-array cables in portions of the lease area to avoid and minimize impacts to important surfclam habitat.

Comment Number: BOEM-2024-0008-1106-0021
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

We also recommend BOEM include in the EIS an alternative for the lease area that considers project design to minimize impacts to important habitats in the project area. This should include consideration of both (i) the inter array cable layouts and (ii) the foundation types to minimize environmental effects, including permanent project impacts and the extent of habitat modification and conversion from combined scour protection and foundation impact footprint on the seafloor. The EIS should evaluate habitat and fisheries data for the lease area and determine options for modifying the cable layout in a manner that avoids and minimizes impacts to resources identified above. Additionally, the PDE considers a broad range of foundation types and we recommend BOEM independently analyze all foundation types and consider selection of the least environmentally damaging project design. This alternative should provide an analysis of the different impacts associated with construction (e.g. foundations that require pile driving vs suction bucket technology, seabed clearance requirements) and operation, including permanent impacts associated with habitat conversion from the foundation and associated scour (e.g. loss of surf clam habitat).

Development of this alternative should begin with high-resolution habitat mapping and analysis in conjunction with an assessment of available survey biomass and fishery operational data. These efforts are necessary, to determine how project design may impact different habitat types in the project area. The material type, configuration, and extent (square footage) of any proposed scour protection for cables, substations, and WTG foundations should be considered when developing alternatives to avoid impacts to sensitive habitats, fishery resources, and the socially and economically significant surfclam fishery within the lease area.

Comment Number: BOEM-2024-0008-1148-0003
Commenter Type: Individual
Commenter: Patricia Robertson

Comment Excerpt Text:

Lastly I guess, while there are no doubt climate issues to be addressed and let's address them, but there are other options that do not involve industrializing our ocean and coastline, those include solar energy in already industrialized areas, nuclear energy and a time when our technology is growing at an exponential rate, think about it, our technology today is literally creating its own new technology, we talk about this every day. It's unfathomable that placing the turbines in the ocean beds is still under consideration at this time of technological growth. There are alternatives.

A.3.2.5. Other comments on alternatives

Comment Number: BOEM-2024-0008-0005-0005
Commenter Type: Individual
Commenter: James Binder

Comment Excerpt Text:

BOEM states in the Notice of Intent that it will include a "No Action Alternative" in the DEIS. This alternative if accepted would preclude development of the Proposed Action. In past EIS's completed by BOEM for other projects, BOEM has relied on outdated State energy plans and information and has not updated its evaluation to include consideration of new clean, alternative technologies, which if implemented, could achieve greater climate progress, at less cost and less environmental impact than the Proposed Action, and within a similar implementation schedule. These technologies include small scale package nuclear plants using fission, fusion for the longer term, hydrogen used as a fuel and for power generation, biomass, combined cycle natural gas power with carbon capture, conservation, amongst others. Relying on outdated State energy plans to identify alternative technologies and not acknowledging the rapid progress of these alternative technologies in the past few years is a disservice. With these alternative technologies, we could achieve the same or better results in meeting climate change goals at lesser cost, more reliably w/o the need for back-up power to support intermittent offshore wind power generation, and without the negative environmental impacts to the ocean, the socioeconomic and cultural well being of impacted nearby communities and commercial fishing. Clearly, leaving the ocean to its current uses, not industrializing the ocean, is the best path forward. When preparing the No Action analyses, please include the most recent information available on alternative technologies and provide a comparison to the risks and benefits expected with the Proposed Action. Please exercise the same rigor in conducting this analysis as that for the Proposed Action.

Comment Number: BOEM-2024-0008-0551-0013
Commenter Type: Advocacy Group
Organization: RODA

Comment Excerpt Text:

RODA, and our members, have repeatedly raised concerns regarding the ability of vessels to safely navigate throughout the multiple areas identified and sold to offshore wind developers by BOEM. The EIS must include an alternative for reasonable transit lanes as consistently requested by fisheries operators since long before the submission of this COP, and BOEM must fully evaluate such transit lanes cumulatively across the Mid Atlantic OSW lease areas. As the agency in charge of offshore wind permitting, leasing, and sales, BOEM has the authority, and responsibility, to fulfill this mandate and ensure the safety of all vessels operating in and around the WEAs. For the commercial fishing gear types found in the Atlantic Shores North project area, 1x 0.6 nautical mile (nm) spacing between turbines is too narrowly spaced for most fishing operations. Thus, if spacing remains prohibitive, resulting in full (or even majority) functional fishing closures, access to viable and safe transit options becomes the single most important mitigating factor to the project design.

BOEM's responsibility does not end once the sale is completed or a COP is approved, and it must consider a developer's proposed layout as only thata proposal. To be clear, fisheries operators and experts neither requested nor agreed to 1x1 nm turbine spacing without additional transit corridors [Footnote 13: See https://static1.squarespace.com/static/5a2eae32be42d64ed467f9d1/t/5dd3d3e476d4226b2a83db25/1574163438896/Proposed+1x1+layout+from+RI-MA+Leaseholders+1+Nov+19+%281%29.pdf.]. BOEM and USCG's analyses of fishing vessel transit in proposed lease areas to date have been replete with missing information, unfounded conclusions, lack of cumulative- scale analysis, and absent or incorrectly referenced citations. The need for safe transit lanes of 4 nm has been raised time and again by fishermen and other fisheries experts, and the proposal RODA submitted to BOEM on behalf of our members in January 2019 remains urgent. The full history of these requests is detailed in RODA's comments to BOEM on the Vineyard Wind SEIS and South Fork DEIS.

Comment Number: BOEM-2024-0008-0551-0015
Commenter Type: Advocacy Group
Organization: RODA

Comment Excerpt Text:

RODA strongly urges BOEM to reconsider the sequencing of the site assessment, COP approval, and NEPA initiation for OSW projects, as information about geological constraints of the site may result in Proposed Alternatives of a DEIS that may not be possible given technical constraints or could be improved with more information. If the site assessment is fully complete prior to the COP approval and initiation of the NEPA analyses, a more realistic Proposed Action would be presented and analyzed. A compression of these different analyses and permitting actions means the public is not adequately informed of the expected project design and again demonstrates why alternatives should be fully analyzed and compared against each other - not solely to the Proposed Action. We strongly urge BOEM to require geological information, which may drastically change a project design in light of fisheries impacts, be more readily available early on in the process.

Comment Number: BOEM-2024-0008-0611-0052
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

The proposed EIS would also limit the number of wind turbines in the lease area essentially only to that proposed by the applicant, with the only differences being that the alternatives had modestly fewer turbines, more space between project sites, different cable placement routes, or less space between turbines. But these modifications have only minor environmental differences from the proposal, So in the NEPA sense they are not true alternatives, merely minor modifications to the proposal.

Comment Number: BOEM-2024-0008-0611-0054
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

NEPA regulations at 1502.14 call for a comparison of the "environmental impacts of the proposed action and the alternatives" The no action alternative is one. The description of the no action alternative and the proposed action use two different baselines which has the effect of promoting the project by diminishing its adverse impacts and accentuating its benefits. The alleged benefits of the proposed action are measured against current natural environment conditions as absolutes. But the adverse impacts are measured against a new baseline consisting of a large number of current and future actions described and their impacts.

There are at least three major problems with that.

First, many of the reasonably foreseeable impacts will come from BOEM and NMFS actions so they are not part of a "no action" scenario.

Second, by burying its decisions and actions in the "no action" discussion BOEM seeks to escape responsibility for those decisions and the cumulative impact of its program. In fact, many of the "no action" events are part of the overall BOEM offshore wind program and are connected actions and call for the assessment of projects as alternatives .

Third, the BOEM use of all reasonably foreseeable events as a new baseline trivializes the impacts of the project because it pits a very large number of actions with adverse impact against the impacts of the proposed action-one project. Against such a collective large impact even a significant project impact will appear insignificant. This distorts and biases the scoring toward dismissing the projects adverse effects.

In contrast, it does not create such a large impacting baseline when it deals with alleged project benefits such as climate change. It does not contrast the project's stated greenhouse gas reductions against global emissions nor against foreseeable action say by China over the next 20 years selling coal plants to Africa. Such comparisons would make those modest project reductions appear less than minuscule and cast doubt on the project purpose. This creates disparate treatment of project benefits versus adverse impacts which renders the document essentially useless for decision-making purposes.

Comment Number: BOEM-2024-0008-0633-0011
Commenter Type: Federal Agency
Organization: Mid-Atlantic Fishery Management Council and New England Fishery Management Council

Comment Excerpt Text:

Thorough site characterization work should be done prior to publication of the draft EIS and the associated public comment period. We believe this is consistent with the recently published Renewable Energy Modernization Final Rule, under which "geophysical survey data is required at each foundation and cable location in the COP to develop the geologic model as well as for environmental reviews." The range of alternatives should be informed by detailed information on seabed conditions in the lease area. BOEM should seek to avoid issues that occurred with other wind projects where alternatives taken out to public comment were later deemed infeasible based on seabed conditions (e.g., presence of glauconite in Empire Wind 1). The EIS should also specifically explain if, and to what extent, seabed conditions dictate turbine and offshore substation foundation type.

Comment Number: BOEM-2024-0008-0633-0012
Commenter Type: Federal Agency
Organization: Mid-Atlantic Fishery Management Council and New England Fishery Management Council

Comment Excerpt Text:

The NOI indicates that the EIS may consider a "uniform grid alternative" which would "move all permanent structures that narrow any linear rows and columns to fewer than 0.6 nautical miles (1,100 meters) or in a layout that eliminates two distinct lines of orientation in a grid pattern." Uniform layout should not be an alternative; it should be a standard requirement that applies to all offshore wind energy projects. Uniform grid layouts are necessary for navigational safety and, when sufficiently spaced, can help to reduce negative impacts to fishing and transit within the project area. BOEM should not allow any consideration of placing permanent project infrastructure in locations that reduce the spacing for structures in this already tightly spaced project. It is worth noting that the proposed spacing of 0.6 by 1 nautical mile is narrower than several other projects planned for the East Coast. Further restricting navigation by placing structures in intermediate locations within the grid pattern would be very problematic and would undermine the intent of the grid pattern.

Comment Number: BOEM-2024-0008-0633-0003
Commenter Type: Federal Agency
Organization: Mid-Atlantic Fishery Management Council and New England Fishery Management Council

Comment Excerpt Text:

The alternatives should be informed by thorough site characterization work.

Comment Number: BOEM-2024-0008-0633-0004
Commenter Type: Federal Agency
Organization: Mid-Atlantic Fishery Management Council and New England Fishery Management Council

Comment Excerpt Text:

All project infrastructure should be placed in the same uniform grid layout.

Comment Number: BOEM-2024-0008-0647-0007
Commenter Type: Federal Agency
Organization: FWS

Comment Excerpt Text:

1. Birds:

A. The tips of large and relatively slow-moving blades on wind turbines can make the blades deceptively transparent to birds' eyes (Hodos 2003). This phenomenon is referred to as "motion smear" or "motion blur" and may increase the likelihood of bird collision with turbines. To reduce it, a black attachment may be placed on the top of one of the blades. This may require placing attachments of the same type and weight on the other two blades to balance the rotor assembly; however, these attachments must be transparent or at least painted a contrasting color (Hodos 2003). Another way to enhance visibility consists of subdividing each white blade into 6 parts; the first blade is painted black in areas 1 and 4; the second blade is painted black in areas 2 and 5; while the third is painted black in areas 3 and 6 (Hodos 2003). A third technique for increasing visibility pattern consists of painting one of the three blades black (Hodos 2003). A recent study in Norway tested applying contrasting paint to the rotor blade and found that it resulted in significantly reduced annual fatality rate for several bird species (May et al. 2020).

B. If the onshore construction requires the development of proposed operation and maintenance facility buildings or structures, please ensure the following:

a. Refer to the Services Recommended Best Practices for Communication Tower Design, Siting, Construction, Operation, Maintenance, and Decommissioning. This document can be found at: https://www.fws.gov/media/recommended-best-practices-communication- tower-design-siting-construction-operation.

b. Utilize lighting that reduces adverse effects to migratory birds at night. For more information, please refer to Enclosure A Beneficial Practices to Reduce the Potential Impact of Lighting on Migratory Birds.

Comment Number: BOEM-2024-0008-0647-0008
Commenter Type: Federal Agency
Organization: FWS

Comment Excerpt Text:

2. Birds and Bats:

A. Whenever possible, integrate strike detection technologies, cameras, acoustic monitoring (for bats only), Motus stations, radar, perching deterrents, or other mitigation and monitoring technologies into wind turbine and project designs. Ultrasonic acoustic deterrents have also been found to significantly reduce bat fatalities at wind turbines in certain circumstances (Weaver et al. 2020). An extensive list of potential technologies and solutions can be found at the Tethys Wind Energy Monitoring and Mitigation

Technologies Tool website located at: https://tethys.pnnl.gov/wind-energy-monitoring-mitigation-technologies-tool. A review of multiple seabird monitoring technologies for offshore wind farms can also be found at Nicholls et al. (2022). Plans for integrating mitigation and monitoring technologies should be developed in coordination with the Service and other applicable state or Federal agencies.

B. Identification of key migratory periods and possible use of temporary curtailment during those periods to protect species in coordination with the Service and other applicable state or Federal agencies.

C. Create mitigation plans to offset the impacts anticipated to birds and bats (e.g., habitat loss, incidental killing) in coordination with the Service and other applicable state or Federal agencies. For example, this may include the creation, restoration, or enhancement of habitat to conserve these species. Additionally, preservation of land that benefits the conservation of these species could possibly serve as another option to mitigate for adverse impacts.

Comment Number: BOEM-2024-0008-0778-0005
Commenter Type: Individual
Commenter: Prof. Edgar Gunter

Comment Excerpt Text:

The vastly increased amount of energy that is required from data centers and AI could be supplied by the new modern small modular nuclear reactors.
Without massive government subsidies, all wind turbines would never be built.

Comment Number: BOEM-2024-0008-0800-0003
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

3. The project is not the most efficient way to use alternative energy sources for our area. The cost involved is huge and the damage done to the ocean floor will be irreversible. Allowing homeowners and businesses,especially seasonal residences and businesses to generate excess solar energy is much more efficient. Presently local power companies do not allow this. You are not allowed to generate more power than you typically use. Infrastructure that currently exists would have to be upgraded, but it would do less damage to the surrounding environment than a major windfarm. Why not try this first?

Comment Number: BOEM-2024-0008-1043-0006
Commenter Type: Local Government
Organization: Borough of Sea Girt, NJ Planning Board

Comment Excerpt Text:

A concern that the long-term efficiency and benefits of the proposed alternative energy source have not been fully substantiated / studied / documented *I* vetted *I* shared

Comment Number: BOEM-2024-0008-1070-0053
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Noise: Quieter foundation technologies such as gravity-based or suction bucket (or "caisson") foundations eliminate the need for pile driving and are thus one of the most effective technologies available for mitigating noise risk to whales and other marine life during offshore wind development. We urge the use of quieter foundations during offshore wind energy project installation and stress the importance of providing full consideration to selecting these options as the preferred alternative.

Comment Number: BOEM-2024-0008-1070-0007
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Alternatives Analysis

The Draft EIS must "inform decision makers and the public of reasonable alternatives that would avoid or minimize adverse effects or enhance the quality of the human environment.." [Footnote 13: 40 C.F.R. 1502.1(b).] The alternatives analysis is "the heart of the environmental impact statement" and "should identify the reasonably foreseeable environmental effects of the proposed action and the alternatives" so as to "sharply define the issues for the decision maker and the public and provide a clear basis for choice among options." [Footnote 14: Id. 1502.14.] BOEM's review of alternatives must "serve as the means of assessing the environmental impact of proposed agency actions, rather than justifying decisions already made." [Footnote 15: Id. 1502.2(g).] The alternatives analysis is "the linchpin of the entire impact statement," and it is "absolutely essential to the NEPA process that the decisionmaker be provided with a detailed and careful analysis of the relative environmental merits and demerits of the proposed action and possible alternatives." [Footnote 16: NRDC v. Callaway, 524 F.2d 79, 92 (2d Cir. 1975).] BOEM must carefully consider a full range of alternatives to the Project, including all necessary mitigation and monitoring of environmental impacts.

Comment Number: BOEM-2024-0008-1070-0009
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Atlantic Shores North has indicated its preference for several technological choices, turbine layout, and cable corridor preferences throughout the COP. Despite these stated preferences, we urge BOEM to conduct an alternatives analysis that considers both their preferred choices as well as other alternatives that may offer different degrees of impact. To allow BOEM to conduct a sufficient NEPA review of the project, Atlantic Shores North must provide enough specifics on each possible configuration covered by the proposed envelope to enable evaluation of impacts on affected species and to fully evaluate the proposal. To encompass the full range of reasonably foreseeable impacts, BOEM's analysis must include an alternative that combines the most disruptive components for each option included in the envelope. The design envelope alternative also cannot be conceived or analyzed so broadly that it impairs BOEM's duty to effectively "inform decision makers and the public of the reasonable alternatives which would avoid or minimize adverse effects," as NEPA requires. [Footnote 17: Id. 1502.1(b).]

Comment Number: BOEM-2024-0008-1106-0019
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

We also recommend BOEM consider relocation of proposed OSSs to coincide with an existing turbine foundation location consistent with previous comments from NMFS and the US Coast Guard on other projects. As depicted in Figure 1.1-3 of the COP, two OSSs would be located between WTGs, reducing the spacing between turbines and causing navigation and safety impacts to vessels operating in this area that could also impede search and rescue operations by the US Coast Guard.

Comment Number: BOEM-2024-0008-1106-0020
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

The proposed project also considers the construction of an HVDC converter station with the use of an open loop cooling system, which may adversely impact marine resources in the project area. These open loop cooling systems emit heated effluent and include an intake which may result in impingement and entrainment of important marine resources, including eggs and larvae for surf clam and other species with designated EFH in the area, as well as important food sources for federally managed fish and protected species. We recommend BOEM consider the required use of closed-loop cooling system(s) for any offshore converter station(s) to reduce or eliminate adverse impacts from impingement and entrainment of early life stages of fish and shellfish (pelagic habitat) in the lease area, primarily Atlantic surfclam larvae.

Comment Number: BOEM-2024-0008-1106-0025
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

Alternatives Considered but Rejected From Further Analysis
For any alternatives (or components of an alternative) that are rejected and/or not carried forward for further analysis, BOEM should provide a clear explanation for its decision in the EIS. Specifically, for alternatives that are rejected at the scoping phase or later in the process due to "technical or economic infeasibility," we recommend BOEM provide a detailed justification that clearly explains the constraints. For economic feasibility concerns, a cost-benefit analysis should be performed to ensure appropriate consideration of unquantified environmental amenities and values along with economical and technical considerations. Cost and benefit considerations should include both quantitative and qualitative factors (economic, environmental, public health and safety, equity, etc.) to the fullest extent possible. Similarly, we request any justification reports for infeasibility be made available to cooperating agencies early in the scoping or DEIS stage so we may better understand Project constraints and resulting impacts on trust resources.
To identify feasibility constraints early in the process, we recommend pre-construction surveys be completed prior to publication of the Draft EIS to help ensure alternatives carried forward for evaluation are technically feasible. This may also help avoid large-scale project changes later in the process which could delay Project timelines and limit opportunities for public comment.

Comment Number: BOEM-2024-0008-1106-0005
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

In Attachment A, we provide technical comments for consideration as you develop the EIS, including information related to marine resources in the project area and recommend alternatives and mitigation measures to avoid and minimize impacts to these resources and the communities that rely on them.

Comment Number: BOEM-2024-0008-1106-0061
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

Additional Considerations for the EIS
Impact Determinations and Significance Criteria Definitions
The EIS should clearly identify the impacts of all alternatives at an appropriate scale for each affected resource. This should include a meaningful comparison between the impacts of different alternatives in the context of each resource.

Comment Number: BOEM-2024-0008-1108-0040
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

Alternatives / Impact Level Classifications
- EPA recommends the EIS clearly outline which planned offshore wind projects are considered as part of the No Action Alternative. As the No Action provides the baseline against which to assess both positive and negative effects of a project, the addition of potential projects in the vicinity obscures the analysis. We recommend a clear separation between the evaluation of the No Action Alternative and the Cumulative Effects analysis of expected wind energy development.

Comment Number: BOEM-2024-0008-1108-0041
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

- With respect to the development of the EIS, EPA encourages full consideration of alternatives that would allow for the development of the Project such that it meets the purpose and need, while also avoiding, minimizing, and offsetting negative impacts to the greatest extent possible. This includes alternatives related to a) the wind farm area, b) export cable routes and corridors, c) inshore cable routes and corridors, and d) the landfall location. The EIS should include an accessible, clear justification for selection of the preferred alternative by comparing the affected resource areas under each alternative.

Comment Number: BOEM-2024-0008-1108-0042
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

- EPA understands that certain elements of the COP may change. However, BOEM's past EISs characterized all alternatives as having similar impacts despite have measurable differences. Overgeneralizing impact metrics can obscure the clear tradeoffs between alternatives. We recommend BOEM focus on refining the impact level classification categories in order to capture those differences which will allow for a meaningful comparison of impacts and avoidance measures across each alternative.
- Similarly, to fully evaluate the proposed alternatives, EPA recommends the EIS contain comparative resource impact tables and map(s) showing potential permanent and temporary impact areas, types, and resource classifications. While impacts may be approximate at this time, it is critical to identify potential high quality or sensitive resources and prioritize their avoidance as early as possible. The maps should include impacts associated with the proposed substations and their potential configurations. This information would also aid in identification of the environmentally preferable alternative.

Comment Number: BOEM-2024-0008-1115-0003
Commenter Type: Local Government
Commenter: James G Borowski
Organization: Borough of Lavallette

Comment Excerpt Text:

The idea of generating our electricity via renewable resourcess is indeed noble. But to place all of our efforts behind a single source, while simultaneously eliminating alternatives legislatively, is not prudent nor is it in the best interest of the citizens we are elected to serve. If offshore wind proves to be effective, we can incrementally rely on it more while retiring other generation. If not, we can seek other solutions that provide risk mitigation without driving ourselves into darkness. To embark on a megaproject such as this, with no alternatives or contingencies for anything but complete success, in which failure is not an option, is contrary to good public policy.

Comment Number: BOEM-2024-0008-1127-0001
Commenter Type: Individual
Commenter: Brad Williams

Comment Excerpt Text:

Alternatively, BOEM should consider reallocation of lease 549's energy deliverables by increasing the WTG density of neighboring lease 541 which shares a lessee and effectively mitigates the visual and economic impacts of the shoreline.

A.3.3 Bats

Comment Number: BOEM-2024-0008-0645-0012
Commenter Type: Individual
Commenter: Patrice Tullai

Comment Excerpt Text:

Wind turbines kill more bats than any other human industry activity. Some studies show that 888,000 bats are killed each year by collisions with wind turbines.

Lasiurus cinereus, the Hoary Bat is one of 40 species of bats in the United States alone. There are 1,100 species worldwide. Bats are insectivores. They are vital to the health of our environment and our economy.

Comment Number: BOEM-2024-0008-0945-0002
Commenter Type: Advocacy Group
Organization: WhoPoo App

Comment Excerpt Text:

And scientists say wind turbines are the single greatest human threat to migratory bats, which live in different habitats during summer and winter months. Some, like the hoary bat, fly south to Mexico during the winter as insects become more scarce in North America.

In 2017, a team of scientists warned that the hoary bat, a migratory species, could go extinct if the expansion of wind farms continues.

Comment Number: BOEM-2024-0008-1070-0142
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Little data exist on the interactions between bats and offshore wind facilities, although limited research from Europe suggests that bats may be attracted to offshore wind turbines as foraging and roosting habitat. [Footnote 154: It is worth noting that this research was for near shore wind facilities (by comparison to the further offshore facilities proposed for development in the U.S.) and a different suite of bat species. Ahln et al. (2009) observed the common noctule changing altitude near turbines in the Baltic Sea, moving from flying near the sea surface to the top of the turbine. Bats were observed attempting to land on turbines, presumably to either glean insects or roost. In the same study, three bat species were found roosting on nearshore (5.8 km offshore) turbines, including in the nacelles. Ahln I, Baage HJ, Bach L. 2009. Behavior of Scandinavian bats during migration and foraging at sea. Journal of Mammalogy 90:1,3181,323 https://doi.org/10.1644/09-MAMM-S-223R.1.] Bat fatalities from collisions are common at land-based wind facilities in the United States, especially during the fall migration, [Footnote 155: Arnett EB, Brown WK, Erickson WP, Fiedler JK, Hamilton BL, Henry TH, Jain A, Johnson GD, Kerns J, Koford RR, Nicholson CP. 2008. Patterns of bat fatalities at wind energy facilities in North America. Journal of Wildlife Management 72:6178. https://doi.org/10.2193/2007-221; Arnett EB, Huso MM, Schirmacher MR, Hayes JP. 2011. Altering turbine speed reduces bat mortality at wind-energy facilities. Frontiers in Ecology and the Environment 9:209-214 https://doi.org/10.1890/100103.] with the potential for cumulative impacts to cause population-level declines. [Footnote 156: Frick WF, Baerwald EF, Pollock JF, Barclay RM, Szymanski JA, Weller TJ, Russell AL, Loeb SC, Medellin RA, McGuire LP. 2017. Fatalities at wind turbines may threaten population viability of a migratory bat. Biological Conservation 209:172177 https://doi.org/10.1016/j.biocon.2017.02.023; Friedenberg NA. 2020. Population-Level risk to hoary bats amid continued wind energy development: Assessing fatality reduction targets under broad uncertainty. Technical Report 3002017671. Electric Power Research Institute, Palo Alto, CA; Friedenberg NA, Frick WF. 2021. Assessing fatality minimization for hoary bats amid continued wind energy development. Biological Conservation 262:109309

https://doi.org/10.1016/J.BIOCON.2021.109309.] However, information on bat impacts from land-based wind stems largely from post-construction carcass searches, which are not feasible in the offshore environment, [Footnote 157: Assessing bat fatalities based on carcasses found on vessels and structures a technique that has been proposed in several recent offshore wind project Construction and Operations Plans is unlikely to provide a meaningful estimate of bat fatalities, as carcasses can fall far from the wind turbine, based on carcass size, wind speed, turbine height, and other factors. We recommend BOEM consult with Manuela Huso, Research Statistician at United States Geological Survey Forest and Rangeland Ecosystem Science Center prior to making any inferences about total fatalities based on carcasses recovered from structures.] and therefore understanding and addressing impacts to bats from offshore wind facilities will require novel monitoring technologies.

How bats use the offshore environment is not well understood, which further complicates predicting potential risk from offshore wind development. A report prepared by Peterson et al. (2016) [Footnote 158: Peterson TS, Pelletier SK, Giovanni M. 2016. Long-Term Bat Monitoring on Islands, Offshore Structures, and Coastal Sites in the Gulf of Maine, Mid-Atlantic, and Great LakesFinal Report. Topsham, ME, USA. Prepared for the U.S. Department of Energy] for the Department of Energy on bat habitat use in the mid-Atlantic, Gulf of Maine, and Great Lakes the most comprehensive survey of bats offshore in the U.S. to date found that bats were present at all surveyed locations offshore and were detected up to 130 km (70.2 nm) from the mainland. [Footnote 159: Ibid.] Bat activity offshore peaked during the fall migration and generally decreased with distance from shore. Myotis species (a genus of cave bats) were detected at 89% of sites surveyed and migratory tree bats were even more widespread, with eastern red bats, hoary bats, and silver-haired bats detected at 97%, 95%, and 89% of all sites surveyed, respectively. Eastern red bats represented 40% of all detected bat activity offshore. [Footnote 160: Ibid.]

Comment Number: BOEM-2024-0008-1070-0143
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

The presence of migratory bat species offshore is of particular note because three species of migratory tree bats silver-haired bats, eastern red bats, and hoary bats [Footnote 161: Demographic modeling for hoary bats, the bat species most frequently killed by land-based wind turbines in North America, shows that the 2014 land-based wind energy buildout is sufficient to cause a 90% decline in hoary populations over the next 50 years. Although this research focused on hoary bats, the study authors caution that other migratory tree bats, such as eastern red bats and silver-haired bats which also experience high levels of fatalities at land-based wind facilities, might also experience population-level declines; Frick et al. 2017.] are the bat species most highly impacted by land-based wind energy development in North America. [Footnote 162: These three migratory bats represent almost 80% of all bats killed at wind facilities in North America; hoary bats, eastern red bats, and silver- haired bats represent 38%, 22%, and 18% of all bat fatalities at wind turbines in the United States and Canada, respectively. Arnett EB, Baerwald EF. 2013. Impacts of Wind Energy Development on Bats: Implications for Conservation. Pp. 435456 in Bat Evolution, Ecology, and Conservation, New York, NY. Springer https://doi.org/10.1007/978-1-4614-7397-8_21.] Migratory tree bats are believed to be attracted to land-based wind turbines [Footnote 163: Cryan, PM, Marcos Gorresen P, Hein CD, Schirmacher MR, Diehl RH, Huso MM, Hayman DTS, et al. 2014. Behavior of Bats at Wind Turbines. Proceedings of the National Academy of Sciences of the United States of America. National Academy of Sciences https://doi.org/10.2307/43189889; Cryan PM, Barclay RMR. 2009. Causes of bat fatalities at wind turbines: hypotheses and predictions. Journal of Mammalogy 90:1,3301,340 http://www.jstor.org/stable/27755139; Arnett et al. 2008; Horn JW, Arnett EB, Kunz TH. 2008. Behavioral responses of bats to operating wind turbines. Journal of Wildlife Management 72:123132 https://doi.org/10.2193/2006-465; Kunz TH, Arnett EB, Erickson WP, Hoar AR,

Johnson GD, Larkin RP, Strickland MD, Thresher RW, Tuttle MD. 2007. Ecological impacts of wind energy development on bats: questions, research needs, and hypotheses. Frontiers in Ecology and the Environment 5:315324.; Ahln I. 2003. Wind turbines and batsa pilot study. Report for the Swedish National Energy Administration.] and have been recorded altering flight paths to approach turbines. [Footnote 164: Cryan et al. 2014.] Although no scientific consensus exists on why bats are attracted to onshore wind facilities, this behavior puts bats at increased risk for collision. To what extent bats may be attracted to offshore wind turbines merits careful consideration. As mentioned above, limited research from Europe indicates that bats may be attracted to offshore wind turbines [Footnote 165: Ahln et al. 2009.] and bats have been found roosting aboard support vessels during the construction of Block Island Wind Farm and a survey vessel for Kitty Hawk Wind, [Footnote 166: Revolution Wind Construction and Operation Plan (COP) at 4.3.7.2, p. 420; Kitty Hawk COP, Appendix T at T-7.] which suggests that the presence of artificial roosting structures may provide some benefit or attraction to bats in the offshore environment.

Comment Number: BOEM-2024-0008-1070-0037
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Little data exist on the interactions between bats and offshore wind facilities. Bat fatalities from collisions are common at land-based wind facilities in the United States, especially during the fall migration, [Footnote 55: Arnett, E. B., Brown, W. K., Erickson, W. P., Fiedler, J. K., Hamilton, B. L., Henry, T. H., Jain, A., Johnson, G. D., Kerns, J., Koford, R. R., Nicholson, C. P., O'Connell, T. J., Piorkowski, M. D., & Tankersley, R. D. (2008).

Comment Number: BOEM-2024-0008-1070-0039
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Despite this lack of data and given that acknowledging that previous surveys do not enable predictions of numbers of bats affected by offshore wind facilities, the COP concludes that "mortality rates will be relatively low offshore and population level impacts are unlikely."

Comment Number: BOEM-2024-0008-1070-0041
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Moreover, though northern-long eared bats (endangered) were not observed in the offshore project area during pre-construction surveys in the lease area, Atlantic Shores North should still consider the potential for impacts to this species offshore. The Northern long-eared bat has been documented offshore, including on both Martha's Vineyard and Nantucket, indicating that the species can cross open water and the species has been tracked making long distance flights over water in the Gulf of Maine. [Footnote 59: Bird Studies Canada 2018.] Furthermore, a northern long-eared bat was acoustically detected 34 km offshore around South Fork Wind Farm. [Footnote 60: Sunrise Wind Farm COP at 4-431 and Figure 4.4.7-2.]

Comment Number: BOEM-2024-0008-1070-0042
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Given that activity rates from pre construction surveys do not always indicate post construction presence, as bats may be attracted to structures, [Footnote 61: Donald Solick et al., Bat activity rates do not predict bat fatality rates at wind energy facilities, Acta Chiroptera (June 2020); Cris D. Hein et al., Relating pre-construction bat activity and post-construction bat fatality to predict risk at wind energy facilities: A synthesis, Nat'l Renewable Energy Lab. (NREL) (Mar. 2013)] the Draft EIS should analyze the potential risk to both migratory and cave bats, including the federally-listed northern long-eared bat.

Comment Number: BOEM-2024-0008-1092-0004
Commenter Type: Individual
Commenter: Sharon GARRY

Comment Excerpt Text:

Bats that get too close to the wind created by the turbines, have their lungs explode. Bats are a very important resource in combatting pests.

A.3.4 Benthic Resources

Comment Number: BOEM-2024-0008-0004-0003
Commenter Type: Individual
Commenter: Noel Quinn

Comment Excerpt Text:

Large underwater platforms are rapidly colonized by small marine life which in turn attracts larger predators to the area. LBI is heavily populated by tourist and depends on these tourist during summer months!

Comment Number: BOEM-2024-0008-0147-0003
Commenter Type: Individual
Commenter: Regina Littwin

Comment Excerpt Text:

Finally, I would like to bring attention to the environmental impacts regarding cable emplacement and maintenance. The total area of seafloor disturbance would increase due to the substantial increase in the number of cables installed and maintained. These projects would increase the amount of dredging equipment and activities used during installation of the cables. These direct impacts from dredging, typically result in severe injury or mortality for sea turtles as stated in the NY Bight Draft PEIS, 3.5.7-38. Scallop, oyster, and clam beds will also be altered and decimated as well as horseshoe crab protected areas that will be further infringed upon, putting this medically and migratory important species at risk. We cannot forget about these high voltage cables running through our densely populated streets and the effect they will have on humans.

Comment Number: BOEM-2024-0008-0148-0003
Commenter Type: Individual
Commenter: Tom Littwin

Comment Excerpt Text:

The cable emplacement and maintenance will also create seafloor disturbance which will not only affect horseshoe crabs, scallop, oyster, and clam beds but will put thousands of jobs and livelihoods at risk

Comment Number: BOEM-2024-0008-0383-0004
Commenter Type: Individual
Commenter: Catherine Kulp

Comment Excerpt Text:

The necessary laying of cables through the back bay areas will have a huge detrimental impact. Sediment disturbance alone could devastate delicate shellfish farms in the area.

Comment Number: BOEM-2024-0008-0557-0002
Commenter Type: Individual
Commenter: Joseph Pallante

Comment Excerpt Text:

Hundred of thousand of tons of rocks will be dumped on the ocean floor to provide " stability". the ocean floor will be plowed to install the power lines, bored and dug for foundations of these monstrous towers that will industrialize our ocean.

Comment Number: BOEM-2024-0008-0564-0004
Commenter Type: Individual
Commenter: Jane Cagney

Comment Excerpt Text:

Disturbance to the ocean floor and currents could cause a myriad of problems that you just don't know the effects of because it hasn't been studied!

Comment Number: BOEM-2024-0008-0572-0002
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

Construction of these are going to tear up the ocean floor disrupting marine life and interfere with migration paths.

Comment Number: BOEM-2024-0008-0574-0002
Commenter Type: Individual
Commenter: George Thayer

Comment Excerpt Text:

plus add the destruction to the sea bed that the installation of the turbine bases will cause, is incomprehensible.

Comment Number: BOEM-2024-0008-0599-0003
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

Structures installed by the Project could permanently change benthic and fish habitats (e.g., creation of artificial reefs).

Comment Number: BOEM-2024-0008-0964-0001
Commenter Type: Individual
Commenter: Sally Barbato

Comment Excerpt Text:

The amount of stone used for foundations of the turbines themselves coupled with the burying of thousands of miles of cables will destroy clams, oysters, sand lance, and species at the base of our marine food chain. This is an atrocity to the coastline of NJ.

Comment Number: BOEM-2024-0008-0969-0006
Commenter Type: Local Government
Organization: Long Beach Township, NJ

Comment Excerpt Text:

BENTHIC RESOURCES
- Cumulative analysis of impacts to benthic habitats and resources
- Cumulative analysis of electromagnetic fields on marine organisms
- Cumulative analysis of the impact of conversion of soft-bottom to complex structured habitat
- Cumulative analysis of altered habitat and food chain from the introduction of filter-feeders

Comment Number: BOEM-2024-0008-1007-0019
Commenter Type: State Government
Organization: New York State

Comment Excerpt Text:

c. Potential habitat disruption including impacts to marine life and benthic habitat and species. The Agencies support a thorough analysis of impacts to sensitive habitats such as sand ridges and troughs, cold water corals, hard-bottom habitat, and shellfish beds including significant hard clam areas off the southeast shore of Staten Island. Some analysis should also occur on impacts to the biological productivity of Cholera Bank itself, since this is a highly productive area for marine species.

Comment Number: BOEM-2024-0008-1106-0044
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

- Impacts of construction activities (e.g. anchoring, boulder relocation) on benthic habitats;

Comment Number: BOEM-2024-0008-1108-0045
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

Seafloor Disturbance
Preliminary mapping investigations reveal the lease area and proposed cable routes intersect regions of relatively high seabed mobility, high seabed habitat vulnerability and also run through regions designated as sand resource areas (or sand borrow areas) [Footnote 1: https://portal.midatlanticocean.org/], [Footnote 2: https://www.northeastoceandata.org/]. EPA recommends a discussion on these areas be included in the EIS.
- We are concerned with potential impacts to complex bottom habitat and valuable marine resources resulting from seafloor preparation and cable installation. We recommend that the EIS describe mapping efforts to determine optimal cable routes that minimize these impacts. The quantity of the benthic habitat impacted should be evaluated and effects of installation methods such as boulder dragging, cable trenching or jet plow should be compared. We also recommend the EIS include information on the proposed frequency of cable replacement (or maintenance/repair) that may result in additional need for seafloor disturbance to the benthic habitat.

Comment Number: BOEM-2024-0008-1108-0046
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

- EPA also supports the development of a long-term monitoring plan to measure recovery of the benthic habitat from construction related disturbances and to monitor for potential migration of invasive species. An action plan to address incomplete recovery or areas affected by invasive species should be considered.

Comment Number: BOEM-2024-0008-1134-0001
Commenter Type: Individual
Commenter: Lori Malvey

Comment Excerpt Text:

Another factor is some of the sea beds in Portugal where they put up wind turbines never recovered, so they put the underwater cabling in and they say yeah, it will recover again, so initially the oyster beds get depleted and I guess that's "to be expected" and then they are going to miraculously come back. Even with seeding efforts, they have not come back.

So there is something about the electrical currents

A.3.5 Birds

Comment Number: BOEM-2024-0008-0004-0006
Commenter Type: Individual
Commenter: Noel Quinn

Comment Excerpt Text:

There is great potential for turbines to adversely affect wild animals both directly, via collisions, as well as indirectly due to noise pollution, habitat loss, and reduced survival or reproduction. Among the most impacted wildlife are birds and bats, which not only provide benefits such as pollination, but also rid the environment of destructive insects.

Both birds and bats are extremely important for pollination! Without pollinators, the human race and all of earth's terrestrial ecosystems would not survive.

Comment Number: BOEM-2024-0008-0138-0044
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

The COP presents no assessment of the turbine collision risk to the local endangered piping plover and red knot population that nests on the Island and must now cross the wind complexes to get there and back to its offshore migration routes. It discusses the existence of a preliminary biological assessment (BA) prepared for 112 consultation under the Endangered Species Act but presents no results of that analysis in the COP. It says that the final biological assessment will be available in the final EIS but that prevents the public from reviewing and commenting on this important impact. This is another example of lack of full disclosure and lack of coordination with other environmental reviews to the fullest extent practicable. This is another impact that must be presented.

Comment Number: BOEM-2024-0008-0138-0045
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

One hundred and eighteen (118) pairs of piping plovers nested in New Jersey in 2022, a 14% decrease in population size compared to 2021 (137 pairs). The population was slightly above the statewide long-term average (117 pairs) and was the second highest recorded pair number over the last decade. Statewide productivity in 2022 (0.85 fledglings/pair) was below the long-term average (1.04 fledglings/pair) and below the federal recovery goal (1.50 fledglings/pair). This was the second consecutive year statewide productivity dipped below 1.00 fledglings/pair since 2013. Little Beach and North Brigantine Natural Area pair numbers both declined over 50% in 2022. 2022 Piping Plover Nesting Results in New Jersey[Link: https://dep.nj.gov/wp-content/uploads/njfw/plover22.pdf]

Comment Number: BOEM-2024-0008-0138-0046
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

BOEM has a responsibility under the Endangered Species Act (ESA) to assess the risks of offshore wind

energy development to listed species. The red knot, piping plover, and roseate tern are listed species that can migrate through areas developed for offshore wind. BOEM's study program costs $273,374 specifically for the development of a transparent modeling of collision risk for three federally listed bird species to offshore wind development. The final report was due on January 2023. The objective is to develop a user-friendly Collision Risk Model that can inform risk assessments of offshore wind development to three federally listed species (Roseate Tern, Piping Plover, and Red Knot) on the Atlantic OCS. The problem was stated as estimating the number of fatalities of federally-listed birds migrating through offshore wind energy facilities. BOEM states that this information is essential for understanding the potential for rare or uncommon species to encounter conflicts with renewable energy development in these areas for NEPA assessments and ESA consultations. Obviously BOEM does not believe that it has information necessary to determine the impact of offshore wind development on the red knot and piping plover is they are spending $273,374 to develop a new tool to determine the impact. BOEM ESP Ongoing Studies Template[Link: https://www.boem.gov/sites/default/files/documents/environment/environmental-studies/Transparent modeling of collision risk for three federally-listed bird species to offshore wind development_0.pdf]

Comment Number: BOEM-2024-0008-0138-0047
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

It is not known if the BOEM is using the "BAND" model in its Biological Assessment (BA) to analyze collision risk as the bird goes through the wind complex. The description of the BAND model in other literature, as a "static" model indicates that it scores a collision only when a bird actually hits a blade. The blades are relatively thin and the area occupied by the blades compared to the entire area swept by the rotation is very small, so obviously using only that, the risk of collision will be small. This does not account for the risk of injury or fatality from the extreme turbulence and pressure changes that the bird would experience as it passes through the rotor swept area and beyond it, especially just downwind of the turbine. It ignores all the turbulence, pressure changes, and wind shear effects occurring in between and downwind of the blades which could also maim or kill a bird. Any use of the model, without modification, would seems especially inappropriate considering the huge 110-meter blade length and blade tip tangential speeds approaching 200 miles per hour. The BOEM needs to do a current, realistic assessment of the risk of injury and fatalities here in its BA. It cannot rely on the BAND model as it did for the Vineyard Wind 1 Biological Assessment, based on the model's limitations described above, and other major drawbacks expressed by the U.S. Fish and Wildlife Service.

Comment Number: BOEM-2024-0008-0138-0048
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

It is expected that BOEM will apply CRMs to evaluate avian impacts in its BA. While limited, CRMs are one of the only tools available to hypothesize potential impacts to birds from collision in the offshore environment. As such, CRMs provide a mechanism for testing outcomes (e.g., observed collision rates) against the model predictions (e.g., expected collision rates), and BOEM must address the need to collect the data necessary to test these hypotheses. 114 The COP should include a CRM-driven collision risk analysis for all species of conservation obligation which may occur within 20 km of the Atlantic Shores footprint and for which a current CRM would be appropriate, even if the species has not been documented within the footprint. This should include a recent stochastic derivation of the Band model, such as the

McGregor (2018) version[Footnote 1A: McGregor RM, King S, Donovan CR, Caneco B, Webb A. 2018. A Stochastic Collision Risk Model for Seabirds in Flight:61. https://tethys.pnnl.gov/sites/default/files/publications/McGregor-2018- Stochastic.pdf] . BOEM must be transparent in its CRM application. These models are extremely sensitive to the input parameters. A study by Cook et al. (2014) found that estimations of avoidance and collision risk from Band models were highly sensitive to the flux rate (total number of birds passing through the wind farm), corpse detection rate, rotor speed, and bird speed. Factors such as weather (i.e., wind speed and visibility) and habitat use would also affect the accuracy of these estimates, as such factors would greatly influence avian flight patterns and behavior

Comment Number: BOEM-2024-0008-0138-0049
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

Additionally, CRMs should consider differences in daytime and nighttime flight patterns. As Band himself stipulates: For some species typical flight heights are dependent on the season, and in such a case it will be best to use seasonally dependent typical flight heights in assessing collision risk for each month, rather than average flight heights across the year...Flight activity estimates should allow both for daytime and night-time activity. Daytime activity should be based on field surveys. Night-time flight activity should be based, if possible, on nighttime survey; if not on expert assessment of likely levels of nocturnal activity...collision model[s] should take both day and night flights into account. Where there is no night-time survey data available, or other records of nocturnal activity, for the species in question, (or for other sites if not at this site), it should be assumed that the Garthe and Hppop/ King et al. 1-5 rankings apply. These rankings should then be translated to levels of activity at night which are respectively 0%, 25%, 50%, 75% and 100% of daytime activity. These percentages are a simple way of quantifying the rankings for use in collision modelling, and they may to some extent be precautionary

Comment Number: BOEM-2024-0008-0138-0050
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

Conversely, studies by Loss et al. (2013) Choi et al. (2020) and Huso et al. (2020), find that bird deaths not only increase with turbine size, but also suggest that the number of bird deaths from collision with wind turbines is proportional to the number of mw produced in a wind farm. Turbulence above and below the rotor swept zone can affect flight performance. If this should make birds more susceptible to physical interactions with turbines, then larger turbines would only increase that risk.

Comment Number: BOEM-2024-0008-0138-0009
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

The COP fails to rigorously review the project's harm to the Piping Plover, via the risk of crossing the wind complex to get to nesting grounds in Brigantine.

Comment Number: BOEM-2024-0008-0574-0004
Commenter Type: Individual
Commenter: George Thayer

Comment Excerpt Text:

The windmills, once installed, themselves will kill untold amount of birds.

The constant whir and hum of the turbines will interfere with the sensors of any birds that fly near these monstrosities creating untold issues for them.

Comment Number: BOEM-2024-0008-0586-0002
Commenter Type: Individual
Commenter: Theresa Teti

Comment Excerpt Text:

Not to mention the millions of birds that will be slaughtered.

Comment Number: BOEM-2024-0008-0586-0007
Commenter Type: Individual
Commenter: Theresa Teti

Comment Excerpt Text:

How many birds will become extinct?

Comment Number: BOEM-2024-0008-0647-0010
Commenter Type: Federal Agency
Organization: FWS

Comment Excerpt Text:

The Service interprets MBTA to prohibit incidental take of migratory birds and will enforce the statute accordingly (see https://www.fws.gov/policy-library/do225). Incidental take means the taking or killing of migratory birds that results from, but is not the purpose of, an activity. The Service recognizes that a wide range of activities may result in incidental take of migratory birds. Pursuing enforcement for all these activities would not be an effective or judicious use of our law enforcement resources. For that reason, the Service will focus our enforcement efforts on specific types of activities that both foreseeably cause incidental take and where the proponent fails to implement known beneficial practices to avoid or minimize incidental take. Our intention through this policy is to apply a transparent and consistent approach to managing and prioritizing our enforcement of incidental take, taking into account the case law applicable in a given jurisdiction and the facts and circumstances of each case.

a. The following types of conduct are not a priority for enforcement:
(1) A member of the general public conducting otherwise legal activities that incidentally take migratory birds;
(2) A Federal agency conducting activities in accordance with a signed memorandum of understanding with the Service developed under Executive Order 13186 for the conservation of migratory birds; or
(3) A public- or private-sector entity conducting activities in accordance with applicable beneficial practices for avoiding and minimizing incidental take.

b. The Service prioritizes the following types of conduct for enforcement:

(1) Incidental take that is the result of an otherwise illegal activity; or
(2) Incidental take that:
(i) results from activities by a public- or private-sector entity that are otherwise legal;
(ii) is foreseeable; and
(iii) occurs where known general or activity-specific beneficial practices were not implemented.

Comment Number: BOEM-2024-0008-0647-0011
Commenter Type: Federal Agency
Organization: FWS

Comment Excerpt Text:

To better protect migratory bird populations and provide more certainty for the regulated public, the Service seeks to address human-caused mortality by providing information on beneficial practices to avoid and minimize the incidental injury and killing of migratory birds. Beneficial practice means an action implemented to avoid or minimize the incidental take of migratory birds. We also refer to beneficial practices as best management practices, conservation measures, best practices, mitigation measures, etc.

Comment Number: BOEM-2024-0008-0647-0012
Commenter Type: Federal Agency
Organization: FWS

Comment Excerpt Text:

Artificial light at night can attract and disorient migratory birds, leading to exhaustion and collisions with humanmade structures such as buildings and communications towers. Under certain circumstances (e.g., low cloud ceiling, precipitation, high migration passage rate), artificial light at night may contribute to mass mortality of nocturnally migrating birds. This risk may be significantly reduced or eliminated through informed design and operation of artificial lighting. Effective interventions include modifying lighting's angle/direction, timing, and color/wavelength. Please use the attached Service-provided beneficial practices as your guide for reducing risk of incidental take from lighting.

Comment Number: BOEM-2024-0008-0647-0013
Commenter Type: Federal Agency
Organization: FWS

Comment Excerpt Text:

PROTECT OUR NIGHT SKIES
Using Bird-Conscious Lighting

Why We Should Protect Our Night Skies

The night sky is a resource that all people and wildlife, including birds, share. The cycle of day and night is important for the natural rhythms of all living things, promoting natural behavior, health, and well-being. For example, a dark sky is important for billions of birds to properly navigate their nighttime migrations. Artificial lighting at night (lighting), meaning light from sources created by people, may be helpful for security and increasing visibility when it is used well, to the extent it is needed, and when it illuminates only what is intended. However, lighting can attract large numbers of night-migrating birds from as far as 5 kilometers away. Birds can become entrapped in these areas of bright lights, circling endlessly, depleting energy stores needed for migration, and colliding with buildings and infrastructure.

This
phenomenon can be exaggerated on nights with low-cloud ceilings or foggy weather, when birds tend to migrate at lower altitudes and light reflecting on clouds is disorienting. Multiple mass-mortality events involving hundreds of birds have been documented associated with lighting at substations and other towers, buildings, and construction sites on foggy nights during migration.

Comment Number: BOEM-2024-0008-0647-0014
Commenter Type: Federal Agency
Organization: FWS

Comment Excerpt Text:

Bird-conscious lighting is using lighting only where and when it is necessary and illuminating only the intended area. When lighting is necessary, the direction of the light, how long the light is on, the color of the light, and restricting light to the minimum required for safety can all help reduce lighting's negative effects. Below are voluntary approaches to reduce lighting, and we recommend special attention to reduce lighting on foggy nights at substations and other towers, buildings, and construction sites.

Spotlight on Practical and Easy Solutions
Use this step-by-step guide to adopt bird-conscious lighting and make our skies safer for birds.

Turn It Off
- If the lighting is not needed, consider turning it off permanently or see "Timing" below.
- Birds are at greater risk from lighting during spring and fall migration on cloudy nights. Consider if lighting can be temporarily turned off on cloudy nights April-May and August- October.
- If birds become entrapped in an area of bright light that cannot be turned off permanently, turning lights off for 15 to 20 minutes can allow birds to escape the disorienting light and return to normal behavior. If you are unsure whether birds are or will be entrapped, plan regular breaks in the lighting or implement timers (see below) to allow an opportunity for birds to escape.

IMAGE: Migrating birds become disoriented by lights and drawn into brightly lit areas where they can easily collide with structures, injuring or killing them. To the left, you see an example of a shielded light, using amber light, which is less impactful to birds.

Timing
- Limit lighting to necessary times only.
- Use timers, dimmers, or motion sensors to turn lights on and off automatically and as needed.

Direction
- Turn off lights that face up into the sky or lights that
illuminate the surrounding landscape.
- Avoid upward light scatter by shielding, selecting, or positioning lights where light is not emitted above the horizontal plane.
- Keep lighting as low to ground as possible, only illuminating
necessary structures.

Color and Brightness
- Use amber, or "warmer", light that is less harmful for most species.
- Warmer colors have longer wavelengths (>########560 nm) and lower correlated color temperatures (CCT <######## 3000 Kelvin degrees)
- Avoid using blue, white, or "cooler", light that is least favorable for birds and other wildlife.-o Cooler colors have short wavelengths (<########560 nm) and higher correlated color temperatures (CCT >########3000 Kelvin degrees)
- Keep light as dim as possible or is necessary.

IMAGE: Illuminate paths as close to the ground as possible with shielded amber or red lights.

Benefits Of Bird-Conscious Lighting
- Immediately effective
- Saves money through less infrastructure and lower energy consumption
- Increases visibility of night skies
- Helps preserve natural cycles important to the health of people, birds, and other wildlife

---

Comment Number: BOEM-2024-0008-0647-0015
Commenter Type: Federal Agency
Organization: FWS

Comment Excerpt Text:

Additional Resources To Help You Preserve The Night Sky
- Learn when seasonal lighting restrictions can be most helpful to migrating birds: https://birdcast.info/
- More information about requirements to light tall structures is here: https://www.faa.gov/faq/what-are-require- ments-aircraft-warning-lights-tall-structures, and Communication Tower lighting recommendations are here: https://www.fws.gov/sites/default/files/documents/usfws-communication-tower-guidance.pdf
- Illuminating Engineering Society. 2020. Lighting Practice: Environmental Considerations for Outdoor Lighting, An American National Standard. Illuminating Engineering Society, 120 Wall Street, New York, New York 10005.
- Guide for parking lot lighting: ParkingLotLightingGuide.pdf (rpi.edu)
- States with laws to reduce light pollution: https://www.ncsl.org/environment-and-natural-resources/states-shut- out-light-pollution
- Night sky friendly products (these products can be considered bird-conscious when the voluntary approaches described above are used): https://www.darksky.org/our-work/lighting/lighting-for-industry/fsa/fsa-products/

Questions? Please contact your local Ecological Services Field Office or Regional Migratory Birds office for more information.

Comment Number: BOEM-2024-0008-0647-0016
Commenter Type: Federal Agency
Organization: FWS

Comment Excerpt Text:

IMAGE: Using times to turn off in office buildings is an effective and easy solution to keeping our night skies dark.

HOW TO IMPROVE YOUR LIGHTS
1. To adopt bird-conscious lighting, first evaluate individual or groups of lights wherever they occur, for example: buildings, parking lots, roadways, walkways, nighttime projects and construction, towers, and any supporting infrastructure. Evaluate lights for whether they are required, useful, or aesthetic. If you are in the design phase of the project, consider the questions below for outdoor and indoor lighting; if your project is already constructed, visit lit areas at nighttime and include visible indoor lighting in the evaluation. Below is an example data sheet for conducting an evaluation.

Location
Interior or Exterior

# of lights
Required or Useful (Y or N)
Aesthetic (Y or N)
Illuminating more than intended area (Y or N)
Steady burning (Y or N)
Color
Direction

2. Review the results of the evaluation using the if/then table below, create an action plan, and then implement the action plan.

If: lighting is not required, useful, or aesthetic
and:
then you should: turn the lighting off

If: lighting is required or useful
and: illuminating more than the intended area
then you should: physically adjust, shield, or lower exterior lighting and block interior lighting with blinds to only illuminate desired areas or switch to lower intensity or dimmer lighting

If: lighting is required or useful
and: steady-burning
then you should: use timers, dimmers, or motion sensors to turn lighting on/off as needed and turn lights off during spring and fall migration

If: lighting is required or useful
and: a 'colder' color (e.g., blue or white)
then you should: switch to warmer amber lighting (wavelength >############ 560 nm, color temperature <############ 3000 K)

If: lighting is required or useful
and: pointing upward (i.e., uplighting)
then you should: turn the lighting off during spring and fall migration or if this is not feasible, turn it off intermittently and during bad weather/low cloud ceiling

If: lighting is not required or useful but is aesthetic
and:
then you should: discuss with the people using the lighting whether it can be turned off when not in use or made unnecessary by shifting activity from night to day

---

Comment Number: BOEM-2024-0008-0647-0004
Commenter Type: Federal Agency
Organization: FWS

Comment Excerpt Text:

The Service has many concerns regarding the project's potential impacts to the biological and physical resources that may be present. This includes, but is not limited to, the following:

- Federally listed, proposed, and candidate species pursuant to the ESA.
- The Service's Edwin B. Forsythe National Wildlife Refuge. Portions of the Refuge, identified as the Brigantine National Wilderness Area, are designated as a Class 1 Wilderness Area. Class 1 Wilderness Areas are afforded, by Congress, Air Quality Related Value protections under the CAA and are also protected by the Wilderness Act.
- Migratory and hibernating bats.

- Migratory birds, which are afforded protections under the MBTA.
- Bald Eagles protected pursuant to the BGEPA.
- Coastal fauna and their habitats.
- Wetland and water resources.
- Any areas protected pursuant to the CBRA that may be impacted.

Comment Number: BOEM-2024-0008-0647-0005
Commenter Type: Federal Agency
Organization: FWS

Comment Excerpt Text:

Please ensure that the future EIS analyzes the effects to these physical and biological resources. Additionally, please contact the Service if there are any issues or concerns related to compliance with the authorities that we implement.

Due to the proximity of other offshore wind projects, the comments the Service will have while reviewing the future EIS for this project will likely be very similar to previous comments on other BOEM offshore wind EIS documentation. As such, we recommend that BOEM reviews the Service's previous comments to ensure that the future EIS documentation for this project addresses them. Projects where we recommend reviewing our previous comments/review include the Atlantic Shores offshore wind South and New York Bight (programmatic EIS) projects.

Comment Number: BOEM-2024-0008-0647-0009
Commenter Type: Federal Agency
Organization: FWS

Comment Excerpt Text:

The enclosed document identifies beneficial practices to reduce the potential adverse effects of artificial light at night on migratory birds. The U.S. Fish and Wildlife Service (Service) is the Federal agency delegated with the primary responsibility for managing migratory birds. Our authority derives from the Migratory Bird Treaty Act of 1918, as amended (MBTA; 16 U.S.C. 703 et seq.), which implements treaties with Canada, Mexico, Japan, and the Russian Federation. Migratory bird in 50 CFR 10.12 means "any bird, whatever its origin and whether or not raised in captivity, which belongs to a species listed in 50 CFR 10.13, or which is a mutation or a hybrid of any such species, including any part, nest, or egg of any such bird, or any product, whether or not manufactured, which consists, or is composed in whole or part, of any such bird or any part, nest, or egg thereof." The list of protected birds is maintained in regulation at 50 CFR 10.13 and includes over 1,000 species.

Comment Number: BOEM-2024-0008-0660-0002
Commenter Type: Individual
Commenter: Jaime Mirabella

Comment Excerpt Text:

It is in path of the Piping Plover, a threatened species of bird that nests in the Holgate Wildlife Refuge.

Comment Number: BOEM-2024-0008-0900-0004
Commenter Type: Individual
Commenter: Roslyn McGivney

Comment Excerpt Text:

We have birds, bat, butterfly migrations to consider

Comment Number: BOEM-2024-0008-0945-0003
Commenter Type: Advocacy Group
Organization: WhoPoo App

Comment Excerpt Text:

Wind energy threatens golden eagles, bald eagles, burrowing owls, red-tailed hawks, Swainson's hawks, American kestrels, white-tailed kites, peregrine falcons, and prairie falcons, among many others.

The expansion of wind turbines could result in the extinction of the golden eagle in the western United States, where its population is at an unsustainably low level.

Any additional mortalities to the golden eagle threatens the species with extinction, scientists with US Fish and Wildlife warned 10 years ago, before the last decade's massive expansion of wind farms.

Comment Number: BOEM-2024-0008-0953-0003
Commenter Type: Individual
Commenter: Kristina Parker

Comment Excerpt Text:

Birds and bats can be injured or killed if they are hit by turbine blades. These deaths may contribute to declines in the population or even elimination of certain endangered species.

Comment Number: BOEM-2024-0008-0969-0007
Commenter Type: Local Government
Organization: Long Beach Township, NJ

Comment Excerpt Text:

BIRDS
- Cumulative analysis of impacts to birds, bats, and other avian species and the risk of collision with wind turbine blades

Comment Number: BOEM-2024-0008-0974-0004
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

Wind turbines pose a strike risk to seabirds and migratory birds, which can be injured or killed if they collide with the spinning blades or the tower structures. This is especially concerning for endangered or threatened species.

Comment Number: BOEM-2024-0008-1010-0015
Commenter Type: Local Government
Organization: Cape May County, NJ

Comment Excerpt Text:

The County is concerned about the impacts to migrating avian species through and around offshore windfarms as this area of study is not well understood. Conservative estimates project that at least 681,000 birds are killed by collisions with wind turbine blades each year, with an emphasis on smaller birds. [Footnote 8: How Many Birds Are Killed by Wind Turbines] On
land, wind farms are responsible for the death of over 150 bald and golden eagles due to blunt force trauma from turbine blades. [Footnote 9: Wind Energy Company to Pay $8 Million in Killings of 150 Eagles] As wind-power grows across America and into open-water areas that are used for migration, these numbers are likely to be severely underestimated based on both the lack of current information available on bird-deaths and the rapid increase of the number of turbines in operation.

Comment Number: BOEM-2024-0008-1010-0016
Commenter Type: Local Government
Organization: Cape May County, NJ

Comment Excerpt Text:

A 2020 study of tagged Piping Plovers showed evidence that the migratory path of this species is directly through as many as 12 of BOEM's wind-energy lease areas. [Footnote 10: Loring, Pamela & Mclaren, James & Goyert, Holly & Paton, Peter & Loring, Pamela & Mclaren, J & Goyert, H & Paton, P. (2020). Supportive wind conditions influence offshore movements of Atlantic Coast Piping Plovers during fall migration 2 Piping Plover migration. The Condor. 122. 1-16.
10.1093/condor/duaa028] These migratory paths are part of the Atlantic Flyway and are shown in Figure 1. Various stopover areas along the Atlantic Flyway, such as Cape May
Meadows, Stone Harbor Point, and the Forsythe National Wildlife Refuge, are recognized as critical points for migratory birds. As avian species migrate over water at night, as the 2020 study showed most piping plovers do, they may be attracted to lighting components of the wind farms that could result in blind collisions with turbines due to poor nighttime visibility, haze, fog, or other weather conditions that reduce visibility. Such collisions would go undetected and would occur far from shore where their deaths would be unable to be recorded and monitored. BOEM suggests that this impact would be localized. However, the County is concerned that BOEM is substantially underestimating the adverse impact posed to avian species. The proposed Atlantic Shores site spans 100,000 acres and is just one of 48 planned wind farms along the Eastern Seaboard, many of which cover substantially larger acreage than Atlantic Shores North. To categorize the impact of one wind farm that spans nearly 100,000 acres as 'localized' is a failure to consider the cumulative impacts of multiple wind farm arrays that will exist adjacent to one another and is a violation of NEPA guidelines for cumulative impacts.

Comment Number: BOEM-2024-0008-1010-0017
Commenter Type: Local Government
Organization: Cape May County, NJ

Comment Excerpt Text:

BOEM also states that wind farms may have a beneficial impact on bird populations due to the artificial reef effect which may create greater foraging opportunities. While this may be true, it places birds at greater risk of colliding with turbine blades. Research has shown, as birds seek prey, they tend not to look in the direction of travel, which makes them effectively blind in the direction of travel, greatly increasing their

risk of collision with a turbine blade. [Footnote 11: Understanding bird collisions with man-made objects: a sensory ecology approach] [Footnote 12: Windmill Hits Eagle] The County requests that BOEM provide cumulative analysis of impacts to birds, bats, and other avian species and the risk of collision with wind turbine blades

---

Comment Number: BOEM-2024-0008-1050-0001
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

This project is too close to the Edwin B. Forysthe National Wildlife Refuge. The Refuge, which is actively managed for migratory birds, is located on one of the Atlantic Flyway's most active flight paths, making it a critical link during seasonal bird migration. Its value for the protection of water birds, their habitat, and the habitat of many other species.

Comment Number: BOEM-2024-0008-1070-0102
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

As America's new offshore wind energy industry is established, both birds and bats face multiple risks, including the potential for collision and habitat displacement, which may exacerbate the severity of other conservation threats. Strong protections and robust monitoring programs for birds and bats are necessary to achieve the administration's commitment to deploy 30 GW of offshore wind energy by 2030 while also protecting biodiversity, cultural resources, and other ocean uses.
Offshore wind presents a novel impact to birds and bats that use marine and coastal environments. Because little is truly known about the impact of operational offshore wind turbines on birds and bats in North America, science-based post-construction monitoring, including collision detection, and adaptive management will be critical to improve our understanding about the impacts and necessary mitigation response. This review synthesizes best management practices (BMPs) for birds and bats during the nation's build-out of renewable offshore wind energy development (OWED).

Comment Number: BOEM-2024-0008-1070-0103
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Little is known about how flight altitude for Neotropical passerines and other trans-oceanic migrants varies; current knowledge is based mostly on radar and observations taken from stopover sites on land. Records of migration across the Gulf of Mexico indicate that migrating flocks arriving at the coast are usually flying at heights ranging from 500 m to 2300 m. [Footnote 12: Gauthreaux Jr SA. 1991. The flight behavior of migrating birds in changing wind fields: radar and visual analyses. American Zoologist 31:187204.] Flight altitudes of large groups of migrants, however, can be affected by air temperature, location of boundary layers, turbulence, precipitation, and other atmospheric variables. [Footnote 13: Richardson WJ. 1978. Timing and amount of bird migration in relation to weather: a review. Oikos 30:224272; Kerlinger P, Moore FR. 1989. Atmospheric structure and avian migration. Current Ornithology 6:109142; Richardson W. 1990. Timing of bird migration in relation to weather: updated review. Pp. 78101 in Gwinner E. (eds) Bird Migration. Springer, Berlin, Heidelberg.

https://doi.org/10.1007/978-3-642-74542-3_6; Bruderer B, Underhill LG, Liechti F. 1995. Altitude choice by night migrants in a desert area predicted by meteorological factors. Ibis 137:4455; Bowlin MS, Enstrom DA, Murphy BJ, Plaza E, Jurich P, Cochran J. 2015. Unexplained altitude changes in a migrating thrush: long-flight altitude data from radio- telemetry. Auk 132:808816.] Whimbrel (Numenius phaeopus), a species that makes circumpolar navigations and transits across the Pacific OCS, Atlantic OCS, and Gulf of Mexico, is documented to regularly fly at lower altitudes during trans-oceanic flights in the Eastern Hemisphere. [Footnote 14: Galtbalt B, Lilleyman A, Coleman JT, Cheng C, Ma Z, Rogers DI, Woodworth BK, Fuller RA, Garnett ST, Klaassen M. 2021. Far eastern curlew and whimbrel prefer flying low wind support and good visibility appear only secondary factors in determining migratory flight altitude. Movement Ecology 9:32 https://doi.org/10.1186/s40462-021-00267-5]

Birds are vulnerable to OWED in various ways. Avian species may experience impacts due to: (1) displacement or loss of habitat; (2) barrier effects which can have energetic costs if birds reroute daily movements to foraging grounds or seasonal migratory movements; and, (3) direct injury leading to sublethal impairment or mortality, such as through collision (Figure 2).

[See original attachment for figure 2]
Figure 2. Avian vulnerability to offshore wind energy development can be expressed through various population, collision, or displacement hazards. Illustration from Kelsey et al. 2018. [Footnote 15: https://www.sciencedirect.com/science/article/pii/S0301479718309228.]

Comment Number: BOEM-2024-0008-1070-0104
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

True seabirds, terns, gulls, pelicans, and cormorants are more sensitive to collision; nocturnal migrants and shorebird migrants are sensitive to barrier impacts and collision. Diving birds, like alcids and loons, are also sensitive to potential impacts from secondary entanglement and underwater noise from construction and operations activities. Penguins, like alcids obligate marine underwater foragers, are known to avoid entirely key foraging grounds impacted by seismic activity. [Footnote 16: Pichegru L, Nyengera R, McInnes AM, Pistorius P. 2017. Avoidance of seismic survey activities by penguins. Scientific Reports 7:16305.] A recent study found evidence that Common Murre (Uria aalge) behavior is also directly affected by underwater noise. [Footnote 17: Anderson Hansen K, Hernandez A, Mooney TA, Rasmussen MH, Srensen K, Wahlberg M. 2020. The common murre (Uria aalge), an auk seabird, reacts to underwater sound. The Journal of the Acoustical Society of America 147:4,0694,074.] Furthermore, seabirds that use upwellings and ocean turbulence [Footnote 18: Lieber L, Langrock R, Nimmo-Smith WAM. 2021. A bird's-eye view on turbulence: seabird foraging associations with evolving surface flow features. Proceedings of the Royal Society B: Biological Sciences 288:20210592 https://doi.org/10.1098/rspb.2021.0592] as ecological cues to locate consistent foraging areas [Footnote 19: Urmy SS, Warren JD. 2018. Foraging hotspots of common and roseate terns: the influence of tidal currents, bathymetry, and prey density. Marine Ecology Progress Series 590:227245.] may be attracted to the wakes created by physical infrastructure from renewable energy. [Footnote 20: Lieber L, Nimmo-Smith WA, Waggitt JJ, Kregting L. 2019. Localised anthropogenic wake generates a predictable foraging hotspot for top predators.
Communications Biology 2:18.] If turbine platforms mimic cues birds rely on to identify feeding hotspots, even when foraging fish are not present, an ecological trap is set whereby birds expend energy in an unproductive environment and additionally expose individuals to a higher collision risk.

A great deal still remains unknown regarding impacts of offshore wind to avian species in the United States. Evaluation of those impacts must be based on explicitly defined monitoring and adaptive

management plans. These efforts must include a commitment to sufficient standardized monitoring before, during, and after leasing and construction. Most importantly, the adaptive management plan must explicitly outline a strategy to employ adequate mitigation measures, based on the impacts observed through the monitoring efforts. Furthermore, best monitoring and management practices (BMPs) should be incorporated into regional adaptive management plans to adequately measure and mitigate cumulative impacts to birds from offshore wind developments expected across U.S. coastlines for the reasonably foreseeable future.

Comment Number: BOEM-2024-0008-1070-0105
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

State and federal permitting agencies (e.g., BOEM), plus offshore wind lease holders and developers, are responsible for upholding conservation obligations for protecting birds within the U.S., including those species protected under the Migratory Bird Treaty Act (MBTA) and the Endangered Species Act (ESA). Birds are also covered under obligations for conservation under the Fish and Wildlife Conservation Act as amended in 1988, Executive Order 13186, Responsibilities of Federal Agencies to Protect Migratory Birds, the North American Waterbird Conservation Plan, the U.S. Shorebird Conservation Plan, the Memorandum of Understanding ("MOU") between the U.S. Minerals Management Service and USFWS regarding implementation of Executive Order 13186, the United Nations Convention on the Conservation of Migratory Species of Wild Animals (CMS), and BOEM, DOI, USFWS, and NOAA's membership in the IUCN (hereinafter collectively referred to as the "conservation obligations").

The MBTA states that, "[u]nless and except as permitted by regulationsit shall be unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, kill, attempt to take, capture, or killany migratory bird." [Footnote 21: 16 U.S.C. 703 (1918).] For decades DOI has interpreted the MBTA to encompass "incidental takes" of migratory birds, including from wind turbines. A rule-making process is now underway to codify this protection and provide a regulatory pathway to provide incidental take permits to industries for which take is expected. To comply with the MBTA, regulators and developers should be prepared to estimate and document take resulting from offshore wind energy projects.

Many bird species that migrate offshore are also protected under state regulations in addition to the federal ESA and the MBTA. However, the states' endangered species lists and Wildlife Action Plans may not always consider each vulnerable species that occurs in federal waters. Many species that occur offshore are not considered vulnerable by an individual State because they do not occur frequently in that state's jurisdiction yet may be protected nevertheless under other state laws.
Razorbill (Alca torda), for example, is considered threatened in the state of Maine but not in Massachusetts, even though they occur regularly in offshore Massachusetts during winter months and are expected to be vulnerable to habitat loss from offshore wind.

BOEM must also consider species prioritized for conservation by avian stakeholder collaborations, including the Atlantic Flyway Shorebird Initiative, Partners in Flight, Atlantic Coast Joint Venture, and the North American Waterbird Plan. Along with ESA-listing and IUCN Red List status, the species included on these initiative priority lists are of high national and international conservation concern. Their priority status by these entities highlights their vulnerability and is further indication of a need for enhanced mitigation and conservation measures to ensure their survival.

Comment Number: BOEM-2024-0008-1070-0106
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Birds vulnerable to impacts both from offshore wind development and from climate change, like Northern Gannets (Morus bassanus) and phalaropes, should receive additional consideration. The Northern Gannet is considered vulnerable to both collision and displacement effects from offshore wind, [Footnote 22: Furness RW, Wade HM, Masden EA. 2013. Assessing vulnerability of marine bird populations to offshore wind farms. Journal of Environmental Management 119: 5666; Langston RH, Teuten E, Butler A. 2013. Foraging ranges of northern gannets Morus bassanus in relation to proposed offshore wind farms in the UK: 20102012. Royal Society Protection Birds Report to UK Department of Energy and Climate Change; Lane JV, Jeavons R, Deakin Z, Sherley RB, Pollock CJ, Wanless RJ, Hamer K. 2020. Vulnerability of northern gannets to offshore wind farms; seasonal and sex-specific collision risk and demographic consequences. Marine Environmental Research 162:105196.] and is also likely to face range loss because of climate change. [Footnote 23: Garthe S, Markones N, Corman AM. 2017. Possible impacts of offshore wind farms on seabirds: a pilot study in northern gannets in the southern North Sea. Journal of Ornithology 158:345349; Peschko V, Mendel B, Mercker M, Dierschke J, Garthe S. 2021. Northern gannets (Morus bassanus) are strongly affected by operating offshore wind farms during the breeding season. Journal of Environmental Management 279:111509.] Northern Gannets rely on schools of forage fish like menhaden and sandlance. Much of this species' primary winter distribution habitat in the Atlantic and Gulf OCS areas overlaps extensively with projected call and lease areas. If displacement from turbines leads to avoidance of foraging grounds or loss of access to forage fish, this could be considered a form of habitat loss, and it will be important for BOEM to consider such changes to population vital rates. Red Phalarope (Phalaropus fulicarius) and Red-necked Phalarope (P. lobatus), shorebirds that spend most of their lives on the open ocean, are likely to lose part or all their breeding range because of changing climate. Red Phalarope is predicted to lose nearly half of its breeding range, even under best case warming scenarios. [Footnote 24: Galbraith H, DesRochers DW, Brown S, Reed JM. 2014. Predicting vulnerabilities of North American shorebirds to climate change. PLoS One 9:e108899. https://doi.org/10.1371/journal.pone.0108899] Phalaropes are predicted to be highly vulnerable to both collision and displacement from offshore wind development. [Footnote 25: Robinson Willmot J, Forcey G, Kent A. 2013. The relative vulnerability of migratory bird species to offshore wind energy projects on the Atlantic Outer Continental Shelf: an assessment method and database. Final Report to the U.S. Department of the Interior, Bureau of Ocean Energy Management, Office of Renewable Energy Programs OCS Study BOEM 2013-207.] Therefore, regulators should seriously consider impacts to these or similarly vulnerable species, then provide mitigation measures to reduce additional pressure to these populations and restore potential losses.

Comment Number: BOEM-2024-0008-1070-0110
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Regardless of OCS region, analyses used to support the initial wind energy siting should rely on the best available science for spatial suitability modeling. In these preliminary analyses, we strongly recommend aggregate habitat modeling based on multiple seabird species as was done recently for marine birds in the Gulf of Mexico. [Footnote 38: Figure 23, p. 34, in Memorandum: Request for Concurrence on Preliminary Wind Energy Areas for the Gulf of Mexico Area Identification Process Pursuant to 30 C.F.R. 585.211(b). Available at:
https://www.boem.gov/sites/default/files/documents//Draft%20Area%20ID%20Memo%20GOM%20508.

pdf] This approach furnishes a sound basis for identifying candidate wind energy areas (WEAs) using avian data. Sub-models inclusive of birds should include at least one multiple species data layer to create an aggregate suitability map. [Footnote 39: Ibid.] Using "hot spot" methodology, identifying low habitat suitability for birds (and therefore higher suitability for OWED) can more readily distinguish the most optimal areas for WEA siting.

In addition to a layer based on the aggregate habitat suitability across a range of marine bird species examined, i.e., a metric for total seabird species affected, [Footnote 40: See, for example, Figure 10 "Species richness for two groups of avian species: nearshoreand offshore/pelagic" in Curtice et al. 2019, p. 53.] a second layer can use a metric for overall avian abundance, thereby informing the total number of seabirds that may be at risk of exposure to OWED. [Footnote 41: We have commended BOEM (e.g., in Ocean Wind) for siting WEAs well beyond the densest, highest concentrations of seabirds found in the near- coastal zone. For example, a Marine-life Data and Analysis (MDAT) abundance model for all marine bird species demonstrates this low-risk siting approach using the metric ALL BIRDS group abundance (see Figure 3-6 in the Ocean Wind Construction and Operations Plan, p. 61).] In OCS regions where ESA- or IUCN-listed imperiled species occur, additional priority data layers for such bird species may be advised during the initial suitability modeling. Moreover, those bird species having particular or heightened risk of harm through displacement or collision may merit their own suitability mapping layer.

Once the initial habitat suitability modeling is completed, regional seabird experts may recommend additional, fine-scale siting refinements within the identified WEAs. For example, without reducing the total area available for offshore wind leasing, rearranging the placement of individual leasing aliquots within any WEA might lower risks to the most vulnerable seabird species. [Footnote 42: Re-arrangement of leasing aliquots was recommended in late 2022 to reduce negative impacts from WEA siting to six species of highly imperiled petrels in the Central Atlantic planning area. See https://www.regulations.gov/comment/BOEM-2022-0072-0052.] Similarly, after delimiting those areas less used by marine birds has been completed, more advanced procedures may be advised to avoid finer-scale 'hot spots' or other smaller areas having especially high concentrations of seabirds. [Footnote 43: Nur N, Jahncke J, Herzog MP, Howar J, Hyrenbach KD, Zamon JE, Ainley DG, Wiens JA, Morgan K, Ballance LT, Stralberg D. 2011. Where the wild things are: predicting hotspots of seabird aggregations in the California Current System. Ecological Applications 21:2,2412,257; Davies TE, Carneiro AP, Tarzia M, Wakefield E, Hennicke JC, Frederiksen M, Hansen ES, Campos B, Hazin C, Lascelles B, Anker-Nilssen T. 2021. Multispecies tracking reveals a major seabird hotspot in the North Atlantic. Conservation Letters 14:e12824.] Mapping characterizations of such hotspots can be subjective; various statistical approaches may lead to different conclusions. [Footnote 44: Sussman AL, Gardner B, Adams EM, Salas L, Kenow KP, Luukkonen DR, Monfils MJ, Mueller WP, Williams KA, Leduc-Lapierre M, Zipkin EF. 2019. A comparative analysis of common methods to identify waterbird hotspots. Methods in Ecology and Evolution 10:1,4541,468.] Therefore, care needs to be exercised to account for hotspot methodology that provides valid results across bird species in both space and time [Footnote 45: Santora JA, Sydeman WJ. 2015. Persistence of hotspots and variability of seabird species richness and abundance in the southern California Current. Ecosphere 6:19; Cleasby IR, Owen E, Wilson L, Wakefield ED, O'Connell P, Bolton M. 2020. Identifying important at-sea areas for seabirds using species distribution models and hotspot mapping. Biological Conservation 241:108375.] for the particular wind energy areas concerned.

Comment Number: BOEM-2024-0008-1070-0111
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Large data sets for preliminary mapping of seabird distribution and abundance vary by OCS region. For

the Atlantic OCS, spatial suitability modeling may consult high-spatial resolution statistical model predictions of the long-term average spatial distributions of marine bird species in U.S. Atlantic waters (Figure 4). [Footnote 46: Winship AJ, Kinlan BP, White TP, Leirness JB, Christensen J. 2018. Modeling At-Sea Density of Marine Birds to Support Atlantic Marine Renewable Energy Planning: Final Report. OCS Study BOEM 2018-010. Sterling, VA. 67 pp. Full report and appendices downloadable at: https://coastalscience.noaa.gov/data_reports/modeling-at-sea-density-of-marine-birds-to-support-atlantic-marine-renewable-energy-planning- final-report/.] This dataset represents over three decades of science-quality, geographically referenced, visual sighting data from boat-based and aerial surveys conducted in U.S. Atlantic OCS waters by a range of entities including government agencies, non-governmental organizations, and academic researchers. In collaboration with the U.S. Geological Survey and USFWS, NOAA combined these data with additional survey data from the Canadian Wildlife Service, Environment and Climate Change Canada. Additional seabird mapping products for application in the Atlantic are available through the Marine-Life and Analysis Team (MDAT). [Footnote 47: Curtice C, Cleary J, Shumchenia E, Halpin PN. 2018. Marine-life Data and Analysis Team (MDAT) technical report on the methods and development of marine-life data to support regional ocean planning and management. Prepared on behalf of the Marine-life Data and Analysis Team (MDAT). Accessed at: http://seamap.env.duke.edu/models/MDAT/MDAT-Technical-Report.pdf]

In the Gulf of Mexico OCS, the largest data set currently available for seabirds derives from the Gulf of Mexico Marine Assessment Program for Protected Species (GoMMAPPS). [Footnote 48: Gleason JS, Wilson RR, Jodice PGR, Satg YG, Michael PE, Hixon K, Haney JC, Sussman A. 2022. Seabird visual surveys using line-transect methods collected from NOAA vessels in the northern Gulf of Mexico for the Gulf of Mexico Marine Assessment Program for Protected Species (GoMMAPPS) project from 2017-07-21 to 2019-09-25 (NCEI Accession 0247206) https://www.ncei.noaa.gov/access/metadata/landing-page/bin/iso?id=gov.noaa.nodc:0247206] Collected in 2017 2019, that dataset includes 41,700 km, 2,300 hours, and 293 days of strip transect vessel surveys that summarize abundance, distribution, and behavior for 44 species of offshore birds found in the northern Gulf of Mexico. Within the next three years, two more years of surveys [Footnote 49: Deepwater Horizon Open Ocean Trustee Implementation Group. 2022. Monitoring and Adaptive Management Activity Implementation Plan: Vessel Surveys for Abundance and Distribution of Marine Mammals and Seabirds. https://www.gulfspillrestoration.noaa.gov/sites/default/files/MM%20and%20SB%20Vessel%20Survey%20MAIP_FINAL%20%5B508%20passed%5D.pdf] will be merged with those data, plus surveys from the 2010-2011 Deepwater Horizon blowout, [Footnote 50: Haney JC, Hemming JM, Tuttle P. 2019. Pelagic seabird density and vulnerability in the Gulf of Mexico to oiling from the Deepwater Horizon/MC- 252 spill. Environmental Monitoring and Assessment 191:110.] to create an even larger data set for use in spatial suitability modeling of marine bird habitats in the Gulf.

[See original attachment for figure 5]

Figure 5. Map of the predicted log density for Pink-footed Shearwater during summer in the Pacific OCS. Mapping product from the California Offshore Wind Energy Gateway.52

For the Pacific OCS, the North Pacific Pelagic Seabird Database (NPPSD), maintained by the U.S. Geological Survey, [Footnote 51: Drew GS, Piatt JF. 2015. North Pacific Pelagic Seabird Database (NPPSD): U.S. Geological Survey data release (ver. 3.0, February 2020), https://doi.org/10.5066/F7WQ01T3] includes >############460,000 survey transects designed and conducted by numerous partners primarily to census seabirds at sea. The current database contains abundance and distribution information (e.g., Figure 5) [Footnote 52: Customized at the Habitat & Wildlife window found at the online portal hosted by the California Offshore Wind Energy Gateway. See https://caoffshorewind.databasin.org/maps/new/#datasets=e79976890518478a83db5c7b36195672] on over 20 million birds of 160 species observed over 40 years in a North Pacific region exceeding 25 million square kilometers, an area that includes >############80% of U.S. continental shelf waters, the most productive U.S. commercial fishery, all Pacific U.S. marine sanctuaries, and Alaska Outer

Continental Shelf oil and gas leasing areas. Moreover, these survey efforts include international cooperation between the United States, Canada, Russia, and Japan.

Large data sets described above are generally for purposes of large-scale depictions of the relative abundance of marine bird species across space and time, e.g., identifying marine habitats broadly having low or high suitability for seabirds. Such data sets are less appropriate for detailed site characterization of individual WEAs or for serving as reliable baselines in post-construction monitoring studies. [Footnote 53: Avian Displacement Guidance Committee (ADGC). 2022. Interim Recommendations for Evaluating the Use of Existing Baseline Data in Offshore Wind Site Assessment Processes for the U.S. Atlantic, Offshore Wind Environmental Technical Working Group. December 2022 draft version. 9 pp.] Even for large-scale assessments of marine bird abundance, any analysis should be based on appropriate methodology, provide adequate geographic and/or temporal coverage at the proper resolution, and be consistent with the age of data on which the spatial analyses are based.

Comment Number: BOEM-2024-0008-1070-0121
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

When birds avoid the infrastructure associated with offshore wind farms (OWFs), the various physical accommodations that birds make can constitute a form of habitat loss or habitat degradation. In addition to displacement through avoidance, birds may be behaviorally attracted to OWFs, with the potential consequences of this attraction including habitat sinks (e.g., if prey abundance is lower or predation rates higher) as well as increases in the collision risk linked to the turbine rotor blades and other vertical structures. [Footnote 86: Dierschke V, Furness RW, Garthe S. 2016. Seabirds and offshore wind farms in European waters: Avoidance and attraction. Biological Conservation 202:5968.]

Due to a paucity of studies, especially in North America, much uncertainty exists regarding the full impact of OWFs on seabird abundance and spatial distribution. Difficulties in detecting displacement effects are compounded in large part by the high variability of bird abundance at sea given so much environmental heterogeneity in the ocean through both space and time. [Footnote 87: E.g., Cox S, Embling CB, Hosegood PJ, Votier SC, Ingram SN. 2018. Oceanographic drivers of marine mammal and seabird habitat-use across shelf- seas: a guide to key features and recommendations for future research and conservation management. Estuarine, Coastal and Shelf Science 212:294310.] Evaluating the displacement of seabirds is also impeded by lack of evidence on species-specific reactions to developed sites, and the potential ecological consequences that are faced by the displaced individuals in the population. [Footnote 88: Busch M, Garthe S. 2016. Approaching population thresholds in presence of uncertainty: assessing displacement of seabirds from offshore wind farms. Environmental Impact Assessment Review 56:3142.]

[See original attachment for figure 7]

Figure 7. Birds may avoid offshore wind turbine farms at any of three scales. This behavioral displacement can be via: (1) macro-avoidance, going around the entire set of turbines; (2) meso-avoidance, using flight maneuvers to dodge individual turbines within the farm; or (3) micro-avoidance in making last minute adjustments to avoid the turbine rotor blades.

Comment Number: BOEM-2024-0008-1070-0122
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Changes in abundance of birds around OWFs may be caused by noise and visual disturbance (moving turbine rotor blades), or by the mere presence of associated vertical structures. Avian displacement via avoidance behaviors (Figure 7) may be intensified also by maintenance activities such as increased vessel movement and human activity at the turbines. Phototaxis, i.e., disoriented attraction of seabirds to lit structures at sea, is yet another habitat alteration. If birds are drawn from distance to lights on turbine towers, the number of birds attracted scales as the square of the range from which they are drawn. [Footnote 89: Deakin et al. 2022.] Although potential for such adverse impacts is greatly increased, the distances over which phototaxis occurs in seabirds (especially procellariiforms) [Footnote 90: At least 56 species of Procellariiformes, more than one-third of them (24) threatened, are vulnerable to grounding by lights. See the synthesis in: Rodrguez A, Holmes ND, Ryan PG, Wilson KJ, Faulquier L, Murillo Y, Raine AF, Penniman JF, Neves V, Rodrguez B, Negro JJ. 2017. Seabird mortality induced by land-based artificial lights. Conservation Biology 31:9861,001.] is virtually unknown. In the context of collision with turbine blades, however, the probability of collision is vastly increased, since the flux density inflates as birds pass repeatedly through the rotor swept area.

Research from northern Europe indicates that responses of marine bird species or species can consist of (1) displacement around, (2) attraction to, (3) or neutral association with the overall footprint of offshore wind infrastructure. One large literature review of North American and European avian reactions to wind farms indicates that displacement in offshore habitats is 23 times more prevalent than attraction. [Footnote 91: Marques AT, Batalha H, Bernardino J. 2021. Bird displacement by wind turbines: assessing current knowledge and recommendations for future studies. Birds 2:460475.] Across 71 peer-reviewed studies, avian displacement distances from turbines (mean standard deviation) ranges from 116 64 m in Anseriformes (ducks), 2,517 5,560 m in Charadriiformes (gulls, terns, shorebirds), and 12,062 6911 m in Gaviiformes (loons). [Footnote 92: Ibid.]

During breeding, Northern Gannet shows strong avoidance of OWFs, with a 2137% reduction in habitat use within wind farms, and turbine avoidance distances of 250450 m by birds flying inside the OWF footprint. [Footnote 93: Peschko et al. 2021.] A literature review of European post-construction studies revealed that gannets and loons show consistently strong avoidance behaviors and displacement effects at wind farms, several gulls and Red-breasted Merganser (Mergus serrator) can show weak attraction, with cormorants and shags exhibiting strong attraction. [Footnote 94: Dierschke et al. 2016.] Grebes and fulmars can show strong displacement effects, with inconsistent displacement effects detected in Long-tailed Duck (Clangula hyemalis), Common Scoter (Melanitta nigra), Manx Shearwater (Puffinus puffinus), Razorbill, Common Murre, Little Gull (Hydrocoloeus minutus), and Sandwich Tern (Thalasseus sandvicensis).

Comment Number: BOEM-2024-0008-1070-0141
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Based on federal law and statute, or through international designation and treaty, certain bird species that occur in the Outer Continental Shelf (OCS) waters of the lower 48 United States are obliged to receive greater conservation protections during all phases of offshore wind energy development. These same (or different) bird species may also be granted comparable protections at the state level, although these are not itemized here. Species having such national or international conservation priority status, and that

occur within any of the lower 48 OCS planning regions, [Footnote 122: Although no active energy projects are currently under consideration in the Alaska and Hawaii OCS regions, this species list will be modified to include additional species when appropriate.] and over waters of the Exclusive Economic Zone (EEZ) of the United States, include the following:

Piping Plover (Charadrius melodus)
Conservation status: Atlantic Coast and Northern Great Plains population is THREATENED, and the Great Lakes watershed distinct population segment (DPS) ENDANGERED, under the U.S. Endangered Species Act; NEAR THREATENED under IUCN criterion A3ce (high dependence on continued active conservation management and risk of future declines following stochastic events). [Footnote 123: BirdLife International. 2022. Species factsheet: Charadrius melodus. Downloaded from http://www.birdlife.org on 21/12/2022.] Population size: about 7,6008,400 individuals in Atlantic Coast population. OCS region(s): Atlantic, Gulf of Mexico (Figure A1). Marine distribution inside potential wind-development areas in EEZ of the United States: During spring and fall migrations, this species transits primarily over continental shelf and slope waters from about the latitude of southern North Carolina north to southern Maine (Figure 1).
Individuals wintering in the Gulf of Mexico presumably remain on the coast, but extensive records from Campeche and Yucatan, Mexico also indicate that others must transit open Gulf waters. [Footnote 124: For example, see point locations depicted at:
https://ebird.org/map/pipplo?env.minX=124.3044523775&env.minY=9.50785511115814&env.maxX=-52.4392296479381&env.maxY=54.864915454395]

Red Knot (Calidris canutus)
Conservation status: The rufa subspecies is THREATENED under the U.S. Endangered Species Act; NEAR THREATENED under IUCN criterion A2abc+3bc+4abc (population declines). Population size: ~10,00015,000 individuals in the rufa subspecies. [Footnote 125: BirdLife International. 2022. Species factsheet: Calidris canutus. Downloaded from http://www.birdlife.org on 22/12/2022.] OCS region(s): Atlantic, Gulf of Mexico. Marine distribution inside potential wind-development areas in EEZ of the United States: During spring and fall migrations, very widespread in offshore waters over continental shelf, continental slope, and pelagic zones from south Florida north to Maine (Figure A1).

Marbled Murrelet (Brachyramphus marmoratus)
Conservation status: Distinct population segment (DPS) in Washington, Oregon, and California listed as THREATENED under the U.S. Endangered Species Act (long-term downward trend has continued since listing); [Footnote 126: https://www.fws.gov/species/marbled-murrelet-brachyramphus-marmoratus.] ENDANGERED under IUCN criterion A2bce+3bce+4bce (rapid reduction in southern range expected to continue, under a variety of threats). [Footnote 127: BirdLife International. 2022. Species factsheet: Brachyramphus marmoratus. Downloaded from http://www.birdlife.org on 22/12/2022] Population size: About 7,00014,000 individuals in Oregon; in California ~5,700 individuals. [Footnote 128: Biological Assessment of the Marbled Murrelet (Brachyramphus marmoratus) in Oregon and Evaluation of Criteria to Reclassify the Species from Threatened to Endangered under the Oregon Endangered Species. 2021. Oregon Department of Fish and Wildlife, Salem
https://www.dfw.state.or.us/wildlife/hot_topics/docs/2021%20ODFW%20Marbled%20Murrelet%20Biological%20Assessment%20and%20Reclassific ation%20Criteria%20Review_ODFW_6-21-21.pdf] OCS region(s): Pacific only. Marine distribution inside potential wind-development areas in EEZ of the United States: During the breeding season, found mostly in nearshore and coastal marine waters where nearby terrestrial breeding habitat is most abundant and intact. [Footnote 129: Ibid.] Oceanic habitat use and range during winter is poorly known, but speculated to be more dispersed in waters further from shore during the non-breeding season. [Footnote 130: Strachan G, McAllister M, Ralph CJ. 1995. Marbled Murrelet at-sea and foraging behavior. Pp. 247254 in Ralph CJ, Hunt GL, Raphael MG, Piatt J., Technical Editors. Ecology and conservation of the Marbled Murrelet. Gen. Tech. Rep. PSW-GTR-152. Albany, CA: Pacific Southwest Research Station, Forest Service, US Department of Agriculture.]

California Least Tern (Sterna antillarum)
Conservation status: Subspecies browni on the west coast is ENDANGERED wherever found under the U.S. Endangered Species Act; the species is designated as LEAST CONCERN under IUCN criteria. [Footnote 131: BirdLife International. 2022. Species factsheet: Sternula antillarum. Downloaded from http://www.birdlife.org on 22/12/2022.] Population size: An estimated 4,1005,600 breeding pairs in 2017. [Footnote 132: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=193696, p. 3.] OCS region(s): Pacific only. Marine distribution inside potential wind-development areas in EEZ of the United States: Greatest risk of overlap with potential wind energy areas would seem to be in southern California, especially between the mainland and the southern and eastern Channel Islands (late April to September), with some deep-water, pelagic records south and west of this archipelago. North of Point Conception occurs only very near shore. From October to April, this tern winters entirely outside U.S. jurisdiction, probably in Central and South America.

[See original attachment for figure A1]

Figure A1. Mean cumulative daily occupancy probability from Motus movement models depicting the offshore distributions of ESA threatened Piping Plover, Red Knot, and Roseate Tern. Based on a web application and user interface SCRAM (Stochastic Collision Risk Assessment for Movement), see: https://briwildlife.org/scram/ (accessed 6 January 2023).

Roseate Tern (Sterna dougallii)
Conservation status: Northeastern dougallii subspecies (US, Canada, Bermuda) listed as ENDANGERED under the U.S. Endangered Species Act, with the Florida Keys and Caribbean population of the same subspecies listed as THREATENED; designated LEAST CONCERN under IUCN criteria. [Footnote 133: BirdLife International. 2022. Species factsheet: Sterna dougallii. Downloaded from http://www.birdlife.org on 22/12/2022.] Population size: ~4,600 pairs in northeastern U.S, only 4050 breeding pairs in Florida. [Footnote 134: Estimate for the entire Northeastern population in 2019; see https://www.fws.gov/species/roseate-tern-sterna-dougallii-dougallii.] OCS region(s): Atlantic, Gulf of Mexico. Marine distribution inside potential wind-development areas in EEZ of the United States: During breeding, distributed primarily near and around colonies in adjacent offshore waters of New York, Massachusetts, and nearby states. Depending on migration stage, may occur regularly in offshore waters over the continental shelf from southern New Jersey to southern Maine (Figure A1). Migrating Atlantic Roseate Terns may bypass offshore waters of the Mid-Atlantic Bight, flying directly to and from Greater Antilles and other wintering grounds. [Footnote 135: See Figure 1 in: Mostello CS, Nisbet IC, Oswald SA, Fox JW. 2014. Non-breeding season movements of six North American Roseate Terns Sterna dougallii tracked with geolocators. Seabird 27:121.] Gulf population seems to be largely confined to relatively shallow continental shelf waters of the extreme southeastern Gulf of Mexico and adjacent Florida Straits.

Short-tailed Albatross (Phoebastria albatrus)
Conservation status: ENDANGERED wherever found under the U.S. Endangered Species Act; VULNERABLE under IUCN criterion D2 (very small breeding range, susceptible to stochastic events and human impacts). [Footnote 136: BirdLife International. 2022. Species factsheet: Phoebastria albatrus. Downloaded from http://www.birdlife.org on 22/12/2022.] Population size: ~7,300 total individuals, ~1700 breeding individuals. [Footnote 137: Ibid.] OCS region(s): Pacific only. Marine distribution inside potential wind-development areas in EEZ of the United States: Immature birds (less than three years) occur along eastern Pacific continental shelves from the Gulf of Alaska south to southern California. Despite a very small global population size that keeps local densities low, fidelity of this albatross to shelf edge habitats [Footnote 138: Piatt JF, Wetzel J, Bell K, DeGange AR, Balogh GR, Drew GS, Geernaert T, Ladd C, Byrd GV. 2006. Predictable hotspots and foraging habitat of the endangered short-tailed albatross (Phoebastria albatrus) in the North Pacific: Implications for conservation. Deep Sea Research Part II: Topical Studies in Oceanography 53:387398; Orben RA, Connor AJ, Suryan RM, Ozaki K, Sato F, Deguchi T. 2018. Ontogenetic changes in at-sea distributions of immature short-tailed albatrosses

Phoebastria albatrus. Endangered Species Research 35:2337.] in or near shallower waters makes it more vulnerable to wind energy structures than sympatric albatross species. [Footnote 139: Suryan RM, Fischer KN. Stable isotope analysis and satellite tracking reveal interspecific resource partitioning of nonbreeding albatrosses off Alaska. 2010. Canadian Journal of Zoology 88:299305.]

Trindade Petrel (Pterodroma arminjoniana)
Conservation status: VULNERABLE under IUCN criterion D2 (area of occupancy estimated to be less than 2000 km2, known to exist at no more than 10 locations); [Footnote 140: BirdLife International. 2022. Species factsheet: Pterodroma arminjoniana. Downloaded from http://www.birdlife.org on 21/12/2022.] no current designations under the U.S. Endangered Species Act. Population size: 2,260 individuals. OCS region(s): Atlantic only. Marine distribution inside potential wind-development areas in EEZ of the United States: Primarily occurs from MayOctober in deep pelagic waters beyond the continental shelf in the Mid-Atlantic region (including North Carolina's Outer Banks), with some individuals also using deep waters far off the South Atlantic Bight and south of southern New England.

Bermuda Petrel (Pterodroma cahow)
Conservation status: ENDANGERED wherever found under the U.S. Endangered Species Act; ENDANGERED under IUCN criterion D (management has increased population, but numbers remain extremely small). [Footnote 141: BirdLife International. 2022. Species factsheet: Pterodroma cahow. Downloaded from http://www.birdlife.org on 21/12/2022.] Population size: 196 individuals. OCS region(s): Atlantic only. Marine distribution inside potential wind-development areas in EEZ of the United States: Occurs from MayOctober across a very large swath of ocean at and beyond the continental slope in a 'wedge' of pelagic waters between the Canadian/U.S. continental shelves and the Gulf Stream axis.

Black-capped Petrel (Pterodroma hasitata)
Conservation status: Proposed THREATENED wherever found as a candidate under the U.S. Endangered Species Act; ENDANGERED under IUCN criteria B2ab (very small, fragmented, and declining breeding range and population, continued habitat loss and degradation. [Footnote 142: BirdLife International. 2022. Species factsheet: Pterodroma hasitata. Downloaded from http://www.birdlife.org on 29/11/2022.] Population size: 1,0002,000 individuals; some estimates give fewer than 2,000 pairs. OCS region(s): Atlantic, Gulf of Mexico. Marine distribution inside potential wind-development areas in EEZ of the United States: Found year-found at and beyond the shelf edge near the Florida Current and Gulf Stream between Florida and offshore southern Virginia, but also deeper slope and abyssal plain waters of the Mid- Atlantic and far to the south of the northeastern U.S., as well as uncommonly but regularly in the eastern and central Gulf of Mexico.

Hawaiian Petrel (Pterodroma sandwichensis)
Conservation status: ENDANGERED wherever found under the U.S. Endangered Species Act; ENDANGERED under IUCN criteria A3bce+4bce (very small breeding range, radar studies indicate species is declining rapidly). Population size: 7,500-16,600 individuals. OCS region(s): Pacific only. Marine distribution inside potential wind-development areas in EEZ of the United States: Latitudinally widespread (albeit at very low density) from offshore Washington southward to far offshore zones of southern California. Using primarily outer continental shelf, shelf edge, and deep pelagic waters, it is less likely to be impacted by wind energy infrastructure sited in coastal and inner shelf waters.

Fea's (Cape Verde or Gon-Gon) Petrel (Pterodroma feae)
Conservation status: NEAR THREATENED under IUCN criterion D2; [Footnote 143: BirdLife International. 2022. Species factsheet: Pterodroma feae. Downloaded from http://www.birdlife.org on 29/11/2022.] no current designations under the U.S. Endangered Species Act. Population size: 1,5003,000 individuals. OCS region(s): Atlantic only. Marine distribution inside potential wind-development areas in EEZ of the United States: Individuals during breeding (NovemberMay) generally remain in waters close to their Cape Verdean breeding islands. [Footnote 144: Ramos R, Ramrez I, Paiva VH, Milito T, Biscoito

M, Menezes D, Phillips RA, Zino F, Gonzlez-Sols J. 2016. Global spatial ecology of three closely-related gadfly petrels. Scientific Reports 6:111.] Birds observed off eastern North America, largely from AprilSeptember, may consist of sub-adults and non-breeders. Generally found at and beyond the continental shelf edge, including in deep continental slope waters, and in or near the Gulf Stream boundary, from the Outer Banks north and eastward to far offshore southern New England in the deepest waters.

Desertas (Bugio) Petrel (Pterodroma deserta)
Conservation status: VULNERABLE under IUCN criteria D1 and D2 (very small population, small range limited to a single island, with breeding efforts susceptible to human impacts, introduced species, and stochastic events). [Footnote 145: BirdLife International. 2022. Species factsheet: Pterodroma deserta. Downloaded from http://www.birdlife.org on 01/12/2022.] This is a recently split taxon. [Footnote 146: Treated as a separate species from European taxonomic authorities, but not yet differentiated by the American Ornithologists' Union checklist.] Population size: 250-999 individuals. [Footnote 147: Menezes D, Oliveira P, Ramrez I. 2010. Pterodromas do arquiplago da Madeira. Duas espcies em recuperao. Servio do Parque Natural da Madeira, Funchal, Madeira, Portugal; Ramrez I, Paiva VH, Fagundes I, Menezes D, Silva I, Ceia FR, Phillips RA, Ramos JA, Garthe S. 2015. Conservation implications of consistent foraging and trophic ecology in a rare petrel species. Animal Conservation 19:139152.] OCS region(s): Atlantic only. Marine distribution inside potential wind-development areas in EEZ of the United States: Exceedingly wide-ranging over deep, pelagic waters of the North Atlantic. [Footnote 148: Ventura F, Granadeiro JP, Padget O, Catry P. 2020. Gadfly petrels use knowledge of the windscape, not memorized foraging patches, to optimize foraging trips on ocean-wide scales. Proceedings of the Royal Society B 287:20191775.] Individuals of this species concentrate in the South Atlantic Bight off the United States, additionally
using the Central Atlantic region around the Outer Banks north for transit. [Footnote 149: Ramrez I, Paiva VH, Menezes D, Silva I, Phillips RA, Ramos JA, Garthe S. 2013. Year-round distribution and habitat preferences of the Bugio petrel. Marine Ecology Progress Series 476:269284.] Present in U.S. waters from approximately DecemberMay. [Footnote 150: See Figure 2 in Ramos R, Carlile N, Madeiros J, Ramrez I, Paiva VH, Dinis HA, Zino F, Biscoito M, Leal GR, Bugoni L, Jodice PG. 2017. It is the time for oceanic seabirds: Tracking year-round distribution of gadfly petrels across the Atlantic Ocean. Diversity and Distributions 23:794805.]

Zino's Petrel (Freira) (Pterodroma madeira)
Conservation status: ENDANGERED wherever found under the U.S. Endangered Species Act; ENDANGERED under IUCN criterion D (extremely small population size, breeding only on six cliff ledges in the central mountain massif of Madeira). [Footnote 151: BirdLife International (2022) Species factsheet: Pterodroma madeira. Downloaded from http://www.birdlife.org on 01/12/2022.] Population size: 160-200 individuals. OCS region(s): Atlantic only. Marine distribution inside potential wind-development areas in EEZ of the United States: During breeding, uses only waters within accessible commuting distance of the Madeiran Archipelago. During the non-breeding season, migrates either to the Cape Verde region, further south to equatorial waters in the central Atlantic, or to the Brazil Current. [Footnote 152: Zino F, Phillips R, Biscoito M. 2011. Zino's petrel movements at sea - a preliminary analysis of datalogger results. Birding World 24:216219; Ramos R, Ramrez I, Paiva VH, Milito T, Biscoito M, Menezes D, Phillips RA, Zino F, Gonzlez-Sols J. 2016. Global spatial ecology of three closely- related gadfly petrels. Scientific Reports 6:111.] Just to the south of the Central Atlantic Call Area, there is a single report of this species, a sighting and several photographs taken of a single bird on 16 September 1995 off the Outer Banks, North Carolina. [Footnote 153:
https://ebird.org/checklist/S73344148; photographs of Zino's Petrel off North Carolina are available here: http://seabirding.blogspot.com/2013/09/unsung-september-trip-added-sept-28.html. Occurrence of this species within U.S. EEZ waters is validated in official avian checklists of both the American Birding Association and American Ornithologists' Union.]

Comment Number: BOEM-2024-0008-1070-0027
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

In the Draft EIS, BOEM must consider impacts to a broad range of avian species which may be impacted by the Project, not limited to ESA-listed species. Federally endangered species which have International Union for Conservation of Nature (IUCN) status include the piping plover (threatened), the red knot (threatened), and the roseate tern (endangered). Additionally, in December of 2023, the black-capped petrel (Pterodroma hasitata), a pelagic seabird species, was listed as endangered under the ESA. [Footnote 47: 88 FR 89611] The updated status of the black-capped petrel is not reflected in the current Atlantic Shores North COP, [Footnote 48: Atlantic Shores North Construction and Operations Plan, Volume II: at 4-41] and must be considered appropriately in the Draft EIS.

Comment Number: BOEM-2024-0008-1083-0007
Commenter Type: Local Government
Organization: Borough of Sea Girt, New Jersey

Comment Excerpt Text:

The Borough of Sea Girt's beaches are a protected area designated by the US Fish and Wildlife Service for Piping Plovers and by the NJ
Department of Environmental Protection for Seabeach Amaranth. How does this proposed project not interfere with the regulations set forth by these government agencies?

Comment Number: BOEM-2024-0008-1092-0005
Commenter Type: Individual
Commenter: Sharon GARRY

Comment Excerpt Text:

What is the effect on the migration routes of birds and animals, including the monarch butterfly? These animals, birds and insects are part of a delicate balance that has kept our lives and livelihoods near the ocean prospering for hundreds of years.

A.3.6 Coastal Habitat and Fauna

Comment Number: BOEM-2024-0008-1007-0016
Commenter Type: State Government
Organization: New York State

Comment Excerpt Text:

6. Identify and evaluate potential impacts to the coastal and marine environment including:

Comment Number: BOEM-2024-0008-1007-0017
Commenter Type: State Government
Organization: New York State

Comment Excerpt Text:

a. Impacts to biological resources, including bats, birds, coastal fauna, finfish, invertebrates, essential fish habitat, coral species, marine mammals, sea turtles, and rare, threatened, and endangered (RTE) species.

Comment Number: BOEM-2024-0008-1043-0010
Commenter Type: Local Government
Organization: Borough of Sea Girt, NJ Planning Board

Comment Excerpt Text:

A concern regarding the impact the development will have on the fragile eco-system

Comment Number: BOEM-2024-0008-1043-0004
Commenter Type: Local Government
Organization: Borough of Sea Girt, NJ Planning Board

Comment Excerpt Text:

A concern regarding the potentially adverse impact the
proposed development can have on the environment, marine water-life, and the waterfront community

Comment Number: BOEM-2024-0008-1069-0011
Commenter Type: Advocacy Group
Organization: Clean Ocean Action

Comment Excerpt Text:

At the in-person public meeting, BOEM scientists explained that their long-term wildlife population density estimates combined studies that used different methods, as technology improved over time. Although technological development is necessary to better understand impacts of offshore development on marine ecosystems, it also presents challenges in
consolidating datasets that used different methodologies, creating limitations for interpreting long- term trends.

Comment Number: BOEM-2024-0008-1070-0002
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

While the project will reap significant benefits to New Jersey, it is also important to address the potential negative impacts to the unique habitats and wildlife within the lease area, export cable corridors, and onshore project areas in New Jersey and New York, as well as the Atlantic Outer Continental Shelf (OCS). All offshore wind activities should proceed with strong protections in place for these coastal and marine habitats and wildlife, using science-based measures to avoid, minimize, mitigate, and monitor impacts on valuable and vulnerable wildlife and ecosystems.

Comment Number: BOEM-2024-0008-1083-0008
Commenter Type: Local Government
Organization: Borough of Sea Girt, New Jersey

Comment Excerpt Text:

Preservation entails protection, repair, and maintenance, minimizing excessive removal, replacement, alterations, or new additions. Trenching through the ocean bottom from offshore Atlantic County to Sea Girt threatens this preservation, damaging natural subaqueous land and disrupting ecosystems.

A.3.7 Commercial Fisheries and For-Hire Recreational Fishing

Comment Number: BOEM-2024-0008-0006-0003
Commenter Type: Individual
Commenter: Donna Piraino

Comment Excerpt Text:

My husband and I run a fishing charter out of Gloucester, Ma. We can already see the impacts of offshore projects. Lack of whales. Lack of dolphin and lack of ground fish. The places that these species used to be in abundance is no more. I see nothing but negative impacts for the future.

Comment Number: BOEM-2024-0008-0008-0004
Commenter Type: Individual
Commenter: Robert Maryott

Comment Excerpt Text:

I do not believe that Atlantic Shores was given a consideration to the adverse effects on the marine life as well as the business of those who make a living fishing and clamming off the coast of New Jersey.

Comment Number: BOEM-2024-0008-0062-0006
Commenter Type: State/Local Elected Official
Organization: New Jersey's 9th Legislative District Delegation

Comment Excerpt Text:

Second, our delegation is deeply concerned that the placement of offshore wind turbines threatens the future viability of New Jersey's thriving fishing industry, which consistently serves as a key component of the state's economy. Limitations or mandated prohibition of fishing imposed on areas in proximity to offshore wind turbines stand to cripple the commercial and recreational fishing industries. Warnings have been raised that the state's fishing industry could collapse altogether due to not only the threat to marine wildlife, but also the cost increases directly attributable to offshore wind turbines, which would include but not be limited to sharp spikes in insurance premiums.

Comment Number: BOEM-2024-0008-0138-0040
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

The surfclam fishing industry is one of the largest clamming industries in the United States and employes many residents of the climate justice areas. According to a Rutgers Study, offshore wind farms could reduce Atlantic City's surfclam fishery revenue up to 25%.

Comment Number: BOEM-2024-0008-0155-0002
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

We have fisherman in the area who rely on these ocean waters to survive

Comment Number: BOEM-2024-0008-0383-0003
Commenter Type: Individual
Commenter: Catherine Kulp

Comment Excerpt Text:

This project directly impedes the fishing industry of New Jersey. Scallop fishing areas that have been highly regulated to conserve and protect are going to be injured. Other fishing areas will be unable to be used due to the monopiles being installed. The safety of small and large fishing boats will be impeded by dangerous obstacles and possible radar interference.

Comment Number: BOEM-2024-0008-0403-0001
Commenter Type: Business/Trade Association
Organization: Surfside Foods, LLC

Comment Excerpt Text:

As a member and representative of the Atlantic surfclam industry, I am writing to express our collective concerns and to propose constructive solutions in light of the impending environmental impact statement for the Atlantic Shores North offshore wind energy development project in the mid-Atlantic region. Our industry, while supportive of the nation's renewable energy goals, faces significant challenges due to the overlap of wind energy lease areas with critical surfclam habitats. This overlap threatens the viability of the surfclam fishery, which relies on unobstructed access to expansive marine areas for the effective searching and harvesting of clams. The Atlantic Shores North Project overlaps with the most productive, consistent surfclam grounds in the history of this important fishery.

Comment Number: BOEM-2024-0008-0403-0010
Commenter Type: Business/Trade Association
Organization: Surfside Foods, LLC

Comment Excerpt Text:

Because the time, energy, and expense involved in advancing this project is running headlong into projected offshore array approvals, we urge the Department to engage with this proposal now. It is our

opinion that such a program's demonstrated success would not only salvage New Jersey's important commercial clamming sector but would certainly be preferable to and therefore in lieu of any surf clam industry claim or demand for compensatory mitigation from offshore wind. Inasmuch as our industry wishes to continue surf clamming, and as prior experience involving proposed offshore wind projects have established that meaningful compensatory mitigation by the offshore wind industry associated with anticipated losses would be illusory and certainly insufficient at best, it is our opinion that NJDEP's involvement in exploring and committing to a proposed stock enhancement program is the most practical mitigation proposal advanced for determining whether our industry has any viable future in New Jersey.

Comment Number: BOEM-2024-0008-0403-0011
Commenter Type: Business/Trade Association
Organization: Surfside Foods, LLC

Comment Excerpt Text:

The Atlantic Surfclam Industry and offshore wind energy areas, leased by the Bureau of Ocean Energy Management (BOEM), share a substantial degree of geographical overlap along the eastern seaboard of the United States. It has become evident that the operational requirements of Atlantic Surfclam Vessels and the turbine siting prerequisites for efficient wind power generation are fundamentally incompatible. As a result, we are at risk of losing access to wind energy lease areas that harbor substantial commercial quantities of Atlantic Surfclams.

Comment Number: BOEM-2024-0008-0403-0013
Commenter Type: Business/Trade Association
Organization: Surfside Foods, LLC

Comment Excerpt Text:

Considering this challenge, we humbly request that the New Jersey Department of Environmental Protection take decisive action to ensure the sustainable coexistence of the Atlantic Surfclam Industry and offshore wind energy development. Specifically, we propose the implementation of a comprehensive regional stock enhancement seeding program aimed at mitigating the anticipated loss of access to critical surfclam habitats.

To facilitate the success of this proposed mitigation effort, we suggest the establishment of a dedicated fund. This fund would be responsible for the setup, administration, and associated costs of the Atlantic Surfclam stock enhancement program. Ongoing contributions into this fund, proportionate to the Atlantic Surfclam biomass that will be affected within each wind energy lease area, would be a crucial step towards securing the industry's viability throughout the lifespan of the leases.

While we understand the challenges involved in creating and executing a Regional Atlantic Surfclam Stock Enhancement Program, we firmly believe that viable models from successful terrestrial programs can guide our efforts. Surfside Foods is fully committed to participating in this endeavor and is prepared to contribute its expertise and resources to ensure the program's effectiveness and longevity.

In conclusion, we respectfully implore the New Jersey Department of Environmental Protection to champion the cause of our industry by actively pursuing the establishment of a robust stock enhancement program as a necessary condition for the coexistence of the Atlantic Surfclam Industry and offshore wind energy development.

Comment Number: BOEM-2024-0008-0403-0002
Commenter Type: Business/Trade Association
Organization: Surfside Foods, LLC

Comment Excerpt Text:

The installation of wind turbines creates physical barriers that disrupt traditional fishing operations, adversely affecting the surfclam fishery during offshore wind energy project construction, operation, and decommissioning phases. While the National Environmental Policy Act (NEPA) outlines guidelines for avoiding, minimizing, and mitigating environmental impacts, there is a notable lack of a clear path to apply the principle of minimizing effectively in our context, particularly in leveraging well-established aquaculture practices to mitigate these impacts.

Comment Number: BOEM-2024-0008-0403-0003
Commenter Type: Business/Trade Association
Organization: Surfside Foods, LLC

Comment Excerpt Text:

We propose the integration of open ocean aquaculture as a strategic mitigation measure. By adapting well-established aquaculture techniques, we can enhance surfclam stocks away from wind energy sites, thus reducing fishery displacement and resolving operational conflicts. However, this solution necessitates an adaptation of planning and regulatory frameworks to fully embrace and implement these mitigation techniques within NEPA guidelines. Specifically, it necessitates including open ocean aquaculture in environmental assessments as a key component of alternative analysis. This approach not only addresses the current challenges but also ensures the sustainable development of both renewable energy infrastructure and marine biodiversity.

Comment Number: BOEM-2024-0008-0403-0004
Commenter Type: Business/Trade Association
Organization: Surfside Foods, LLC

Comment Excerpt Text:

The absence of specific mechanisms within NEPA for implementing mitigation principles in fisheries management highlights a critical gap. There is an urgent need for frameworks that recognize and facilitate direct mitigation efforts as viable alternatives to compensation, ensuring the sustainability of fisheries and fostering coexistence between renewable energy initiatives and marine industries.

Comment Number: BOEM-2024-0008-0403-0005
Commenter Type: Business/Trade Association
Organization: Surfside Foods, LLC

Comment Excerpt Text:

Implementation of the Surfclam Stock Enhancement Program
Mitigation Plan:

The Surfclam Mitigation Program will be formulated to address the essential requirement of compensatory mitigation for mitigating the impacts on the surfclam resource resulting from unavoidable activities. Additionally, the program aims to counterbalance the loss of accessibility to fishable surfclam biomass. This comprehensive mitigation initiative is designed to promote the sustainability of the

surfclam population and industry while supporting responsible offshore wind development.
Compensatory Mitigation:

The program mandates compensatory mitigation to offset any adverse effects on the surfclam resource or access to fishable biomass caused by development activities. This mitigation effort is essential to ensure the long-term viability and ecological balance of the surfclam population.
In-Lieu Fee Payments:

As a mechanism for implementing compensatory mitigation, developers will be required to make in-lieu fee payments. The amount of these payments will be determined based on the preconstruction biomass estimates, the regular surfclam surveys (to determine ongoing fishable biomass) and the fixed rate per bushel calculation equal to the costs of procuring and planting of the Atlantic surfclam seed and the costs of running the program.

Funding Allocation and Utilization:

The in-lieu fee payments collected through the Surfclam Mitigation Program will be directed towards fostering the growth and propagation of surfclams. A dedicated coastwide banking program, managed collaboratively by the surfclam industry, will serve as the repository for these funds. The primary objective of this initiative is to utilize the collected funds explicitly for the cultivation, nurturing, and strategic planting of surfclams in appropriate habitats.

Benefits and Sustainability:

The Surfclam Mitigation Program not only serves as a mechanism for offsetting ecological impacts but also contributes to the broader goal of sustaining the surfclam population and its associated ecosystems. By channeling the in-lieu fee payments towards surfclam growth and planting efforts, the program enables the surfclam industry to play a proactive role in habitat restoration and enhancement.
Monitoring and Reporting:

The successful implementation of the Surfclam Mitigation Program will involve regular monitoring by the NMFS NEFSC Atlantic surf clam and ocean quahog survey and developer specific post construction surveys and reporting mechanisms to assess the progress of surfclam growth and habitat enhancement.

Comment Number: BOEM-2024-0008-0403-0006
Commenter Type: Business/Trade Association
Organization: Surfside Foods, LLC

Comment Excerpt Text:

The integration of open ocean aquaculture as a strategic mitigation measure aligns perfectly with Atlantic Shores' goal to better understand the changes in surfclam habitat and abundance within its Lease Area and more accurately understand and mitigate any potential effects on the surfclam industry from the construction and operation of Atlantic Shores' future proposed projects. [Footnote 1: ASOW Appendix II-K: Fisheries Monitoring Plan pg. 11, 2.5.2 Additional Research, Surf Clams]

We strongly advocate for the explicit inclusion of the Atlantic Surfclam Stock Enhancement Program using open ocean aquaculture within the environmental assessments for offshore wind developments. This inclusion is crucial not only for preserving the surfclam populations and their habitats but also for ensuring that renewable energy development proceeds in a manner that is truly sustainable and mindful of existing marine industries. We urge BOEM to recognize this strategy as a fundamental component of the environmental impact statement, ensuring that our mitigation efforts are fully integrated and actionable within the regulatory framework.

Comment Number: BOEM-2024-0008-0403-0007
Commenter Type: Business/Trade Association
Organization: Surfside Foods, LLC

Comment Excerpt Text:

By acknowledging the unique challenges faced by the surfclam fishery and recognizing the potential of open ocean aquaculture as a viable mitigation strategy, we can develop actionable pathways that leverage existing knowledge and industry willingness. Such efforts are essential for the preservation and resilience of vital marine ecosystems and livelihoods, aligning renewable energy expansion with the conservation of our marine heritage.

Comment Number: BOEM-2024-0008-0403-0008
Commenter Type: Business/Trade Association
Organization: Surfside Foods, LLC

Comment Excerpt Text:

In our August 23, 2023 letter to NJDEP, our company requested the following:

"To facilitate the success of this proposed (surf clam) mitigation effort, we suggest the establishment of a dedicated fund. This fund would be responsible for the setup, administration, and associated costs of the Atlantic Surfclam stock enhancement program. Ongoing contributions into this fund, proportionate to the Atlantic Surfclam biomass that will be affected within each wind energy lease area, would be a crucial step towards securing the industry's viability throughout the lifespan of the leases.

Comment Number: BOEM-2024-0008-0403-0009
Commenter Type: Business/Trade Association
Organization: Surfside Foods, LLC

Comment Excerpt Text:

the details around the stock enhancement mitigation program need to be fully explored via candid in person meetings attended by the appropriate stakeholders as part of the commitment to forgo compensatory mitigation. We believe there may be sufficient time prior to advent of offshore wind construction in the impacted areas to determine whether a surf clam stock enhancement program is viable. It is in our opinion the industry will accept a surf clam stock enhancement program [Bold, Underline: in lieu] of compensatory mitigation from the wind industry [Bold: if] a properly designed hatchery to harvest stock enhancement program can be stood up.

Comment Number: BOEM-2024-0008-0483-0004
Commenter Type: Individual
Commenter: Trina Garrett

Comment Excerpt Text:

hey will completely disrupt our fishing industry.

Comment Number: BOEM-2024-0008-0485-0001
Commenter Type: Individual
Commenter: E. Robb

Comment Excerpt Text:

The impact on the local fishing industry as well as, the local recreational fishermen could be disastrous.

Comment Number: BOEM-2024-0008-0509-0003
Commenter Type: Individual
Commenter: Robert Garrett

Comment Excerpt Text:

They will completely disrupt our fishing industry. These monster machines will pump billions of gallons of water into themselves to keep cool and spit the water back into the ocean at 90 degrees.

Comment Number: BOEM-2024-0008-0510-0002
Commenter Type: Individual
Commenter: Karen Brooks

Comment Excerpt Text:

Our fishermen and lobstermen won't be able to work anymore. Most have been doing this their whole lives.

Comment Number: BOEM-2024-0008-0510-0003
Commenter Type: Individual
Commenter: Karen Brooks

Comment Excerpt Text:

People rely on these waters to feed their families as well as many others who enjoy shrimp, Lobster, cod, flounder. Yes they will make your favorite foods highly expensive and should a turbine break well get all the poisonous oils, fuel and whatever else in to our food chains..

Comment Number: BOEM-2024-0008-0516-0001
Commenter Type: Individual
Commenter: Victoria Leyden

Comment Excerpt Text:

The wind turbines are not meant to be in the sea. It will end the fishing industry, killing off the birds that live off those fish & create another dead zone in the sea. Help us maintain our planet as it is and not destroy more!!

Put wind turbines on land if you need them, not in the ocean. Let our ocean be!

Comment Number: BOEM-2024-0008-0517-0002

Commenter Type: Individual
Commenter: Donna Lafleur

Comment Excerpt Text:

I see what is happening to the scallops, a huge food source for New England and the country. Fisherman are reporting high numbers of dead scallops or "clappers" they call them. I believe this is going to wipe out the fishing industry in the North Atlantic as it is already having a major effect on many species of fish. I have heard and read reports of how the wind process will kill off huge numbers of fish larvae and decimate fish populations. Fisherman for decades have had to abide by rules to protect fish populations but the wind farm activities is turning years of conservation upside down. I am also concerned that the industrialization of the Atlantic will put the fishing industry out of business and put thousands of people out of work from the fisherman to the local fish market and those in between.

Comment Number: BOEM-2024-0008-0538-0004
Commenter Type: Individual
Commenter: Mary Smith

Comment Excerpt Text:

Our commercial fishing industry will be destroyed - in the name of green energy. This is wrong!

Comment Number: BOEM-2024-0008-0550-0003
Commenter Type: Individual
Commenter: AJ Conte

Comment Excerpt Text:

This alteration could also limit access to traditional fishing grounds, adversely affecting both recreational and commercial fishing industries that are integral to our community.

Comment Number: BOEM-2024-0008-0551-0021
Commenter Type: Advocacy Group
Organization: RODA

Comment Excerpt Text:

Atlantic Shores North's ongoing and proposed fisheries research is not well coordinated with other OSW projects and fisheries science experts. BOEM must require such coordination, not just assume that its recommendations will be followed without oversight.

Comment Number: BOEM-2024-0008-0551-0004
Commenter Type: Advocacy Group
Organization: RODA

Comment Excerpt Text:

Finally, a GHG analysis must evaluate the effects of a loss of seafood availability. In a recent study comparing the GHG emissions of three sources of animal protein, wild-caught seafood had the lowest impact in each of the categories of GHG emissions, energy use, air pollution, and water pollution. It is

estimated that if just two people with high meat consumption replaced that meat with fish, it would save the emissions equivalent of about driving 6,000 miles over the course of a year [Footnote 4: Peter Scarborough et al. 2014. Dietary greenhouse gas emissions of meat-eaters, fish-eaters, vegetarians and vegans in the UK, Clim. Change 125(2): 179192.]. Carbon emissions associated with seafood production in countries with less stringent environmental regulations (i.e. outside the U.S.) are higher than those of domestic seafood; reduced availability or prohibitive pricing of products will drive consumers to replace sustainable
U.S. seafood with higher-carbon proteins.

Comment Number: BOEM-2024-0008-0551-0005
Commenter Type: Advocacy Group
Organization: RODA

Comment Excerpt Text:

Sustainable American fisheries rely on monitoring and data collection activities tailored toward answering key fisheries management questions, under the "best available science" mandate of the Magnuson-Stevens Fishery Conservation and Management Act [Footnote 5: 16 U.S.C. 1851(a)(2).]. This means available data is typically not well-suited to inform fine-scale OSW planning or test hypotheses related to its environmental impacts. This is particularly true when considering available socioeconomic data for fisheries and OSW. A recent European Parliament report determined "co-locating activities at sea requires an integrated assessment of ecological and socioeconomic costs and benefits," but that "good practice examples of co-existence and co-location still are scarce" and there is "a clear gap of economic and socio-cultural impact assessments for the impact of [offshore renewable] expansion on fisheries." [Footnote 6: Stelzenmller, V. et al., 2020, Research for PECH Committee Impact of the use of offshore wind and other marine renewables on European fisheries. European Parliament, Policy Department for Structural and Cohesion Policies, Brussels. Available at:
https://www.europarl.europa.eu/RegData/etudes/STUD/2020/652212/IPOL_STU(2020)652212_EN.pdf]

RODA reiterates the importance of any entity analyzing fisheries data to work cooperatively with NOAA Fisheries, state agencies, and the fishing industry. To that end, BOEM would improve its prior analyses by expanding the time series of data analyzed and by expanding its cooperation with the fishing industry and/or NOAA Fisheries and state agencies to enhance appropriate data sets. Fishery management measures make it difficult to predict future fishing patterns because they are modified frequently based on variations in stock size and distribution. This also means that a short snapshot of fishing activity is not representative of the long-term needs of individual fisheries.

Because existing federal data gives an incomplete picture of fisheries effort on the individual (or cumulative) project scale, it is necessary for BOEM to work with fisheries experts and the industry to evaluate and augment these data sets. For example, knowing where fleets operate can be difficult as most fishing vessels do not use Automatic Identification Systems (AIS) and VMS does not offer fine-scale spatial data. Some fisheries have very limited reporting requirements from which to derive spatial information at all. To put a finer point on it, the best source of information regarding fishing effort is the fishing industry itself. These experts' local ecological, business, and community knowledge must be included in planning discussions or this information will not be effectively available for informed OSW development.

Comment Number: BOEM-2024-0008-0551-0009

Commenter Type: Advocacy Group
Organization: RODA

Comment Excerpt Text:

BOEM regularly conducts economic cost-benefit analyses for oil and gas activities, and it is unclear why it does not follow the same approach for OSW. This disparity is abundantly obvious in 2020's "Economics Issue" of the agency's Ocean Science newsletter [Footnote 12: BOEM. 2020. Ocean Science 17(2) https://www.boem.gov/sites/default/files/documents/newsroom/ocean-science/BOEM%20Ocean%20Science%202020%20Issue%202.pdf.]. That bulletin appears to describe how BOEM evaluates tradeoffs, costs, and benefits across its programs. While it provides a user-friendly overview of how it prepares cost estimates for OCS oil and gas projects, the OSW- related sections merely repeat vague descriptions of the leasing process without any economic information whatsoever.

The economic importance of fishing, and economic losses associated with loss of fishing grounds and indirect effects, have been systematically underrepresented both in this COP and throughout OSW development more generally. Any economic analysis in a forthcoming EIS must analyze the significant "multiplier effects" that make fisheries far more valuable throughout the supply chain than a simple exposure calculation would suggest. This includes an expected "cascading effect" in diversified fishing businesses where economic stability in one season is required to support their activities in other fisheries throughout the year.

Comment Number: BOEM-2024-0008-0557-0003
Commenter Type: Individual
Commenter: Joseph Pallante

Comment Excerpt Text:

The fishing industry destroyed,

Comment Number: BOEM-2024-0008-0558-0007
Commenter Type: Individual
Commenter: Tony Moutinho

Comment Excerpt Text:

, crush the commercial fishing industry

Comment Number: BOEM-2024-0008-0559-0003
Commenter Type: Individual
Commenter: Gina Cobianchi

Comment Excerpt Text:

Small business, especially in the fishing industry could suffer as much irreparable harm as the bird and marine life.

Comment Number: BOEM-2024-0008-0564-0002

Commenter Type: Individual
Commenter: Jane Cagney

Comment Excerpt Text:

You will destroy the fishing & shell fishing industries.

Comment Number: BOEM-2024-0008-0567-0002
Commenter Type: Individual
Commenter: Maryanne Klemmer

Comment Excerpt Text:

The compelling testimony of the panel of Witnesses at these hearings clearly established the harmful effects of Offshore Wind Industrialization on our Environment, Marine Life and Economy. After becoming educated on these Wind Projects, I feel they can do nothing but fundamentally destroy our wonderful food sources from our Ocean.

Comment Number: BOEM-2024-0008-0573-0002
Commenter Type: Individual
Commenter: Susan Stinson

Comment Excerpt Text:

Secondly, our vibrant commercial fishing industry which supplies food to people across the country will be adversely affected. By destroying our fishing grounds and scallop beds, our fishing economy will be destroyed. Climate activists state that our fishing is decreasing because of ocean warming, but have those oceans been warming do to the proliferation of OSW throughout the North Atlantic- realize that all water bodies are connected henceforth increasing surface water issues through the world? Should we add additional destruction with the possibility of generating minimal/ inconsistent power?

Comment Number: BOEM-2024-0008-0574-0003
Commenter Type: Individual
Commenter: George Thayer

Comment Excerpt Text:

This project will ruin the fishing , crabbing etc off of LBI and cause Viking Village, one of the oldest working fishing villages, to shut down. There will be no fish to catch!

Comment Number: BOEM-2024-0008-0575-0003
Commenter Type: Business/Trade Association
Organization: LaMonica Fine Foods, surf clam industry

Comment Excerpt Text:

While the surfclam industry supports the nation's renewable energy goals, it cannot accept becoming collateral damage to a wind energy area that should never have been leased from the start. After years of futile efforts to establish a compromise with the wind energy companies insofar as safe passage and being able to work within the array, LFF has no choice but to oppose Atlantic Shores North Lease Area OCS-A

0549.
LFF has well documented harvest in Atlantic Shores North Lease Area OCS-A 0549 to show how its landings will be significantly decreased by Atlantic Shores North, Lease Area OCS-A 0549, and many fisheries such as LFF will be seeking fair mitigation/compensation for lost access to historical fishing and clamming grounds.
Thank you for the opportunity to express the views of LFF which will be severely impacted by the development of this wind energy site and is vital to the economies of the Mid-Atlantic and New England fishing communities. Concerns over the negative impacts on the Mid-Atlantic clam industry from developing OCS-A 0549 have been known for many years and yet this NOI has been published, demonstrating how the clam industry has been ignored and how participants' livelihoods are being unnecessarily diminished.

Comment Number: BOEM-2024-0008-0581-0005
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

5. Disturbance of critical fishing areas which sustain commercial fishing boats, families and communities. This isn't something if and when it is realized it is not even close to be the elixir to reduce carbon output reliance and will be too late and can't easily be remedied back to original state.

Comment Number: BOEM-2024-0008-0586-0004
Commenter Type: Individual
Commenter: Theresa Teti

Comment Excerpt Text:

Destroying the fishing industry.

Comment Number: BOEM-2024-0008-0599-0004
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

Commercial fisheries and for-hire recreational fishing could be impacted.

Comment Number: BOEM-2024-0008-0633-0001
Commenter Type: Federal Agency
Organization: Mid-Atlantic Fishery Management Council and New England Fishery Management Council

Comment Excerpt Text:

The Mid-Atlantic Council manages more than 65 marine species [Footnote 1: Fifteen species are managed with specific Fishery Management Plans, and over 50 forage species are managed as "ecosystem components" within the Mid-Atlantic Council's FMPs.] in federal waters and is composed of members from the coastal states of New York to North Carolina (including Pennsylvania). The New England Council has primary management jurisdiction over 28 marine fishery species in federal waters and is composed of members from Maine to Connecticut. In addition to managing these fisheries, both Councils

have enacted measures to identify and conserve essential fish habitats (EFH), protect deep sea corals, and sustainably manage forage fisheries. The Councils support policies for U.S. wind energy development and operations that will sustain the health of marine ecosystems and fisheries resources. While the Councils recognize the importance of domestic energy development to U.S. economic security, the marine fisheries throughout the Mid-Atlantic and New England are profoundly important to the social and economic well-being of communities in this region and provide numerous benefits to the nation, including domestic food security.

Comment Number: BOEM-2024-0008-0633-0016
Commenter Type: Federal Agency
Organization: Mid-Atlantic Fishery Management Council and New England Fishery Management Council

Comment Excerpt Text:

Grouping fisheries by fishery management plan (e.g., Mackerel/Squid/Butterfish, Summer Flounder/Scup/Black Sea Bass) may be useful in some cases (e.g., to prevent disclosure of confidential information associated with fewer than three vessels and/or dealers). However, the EIS should provide as much species-specific information as possible. Although some species are grouped together under one fishery management plan, they have separate regulations and often have important differences in terms of gear types, markets, seasonality, number of participants, and other factors which may be relevant to the impacts considerations in the EIS.

Comment Number: BOEM-2024-0008-0633-0017
Commenter Type: Federal Agency
Organization: Mid-Atlantic Fishery Management Council and New England Fishery Management Council

Comment Excerpt Text:

Several areas in the prime fishing grounds of New Jersey data set and several artificial reefs overlap with or are close to the lease area or the proposed cable corridors. Impacts to fisheries in these areas should be thoroughly analyzed. Setbacks and other restrictions should be considered to reduce the negative impacts of construction activities in these areas.

Comment Number: BOEM-2024-0008-0633-0018
Commenter Type: Federal Agency
Organization: Mid-Atlantic Fishery Management Council and New England Fishery Management Council

Comment Excerpt Text:

Fisheries change over time based on a variety of factors; therefore, the EIS should use the most recent data possible to analyze the impacts of the alternatives on commercial and recreational fisheries. BOEM should coordinate early and often with NOAA Fisheries on the most appropriate data for analysis of potential impacts to fisheries, including fishing and transiting locations, as well as socioeconomic impacts. The EIS should clearly and repeatedly acknowledge the limitations of each data set.

Comment Number: BOEM-2024-0008-0633-0021
Commenter Type: Federal Agency
Organization: Mid-Atlantic Fishery Management Council and New England Fishery Management Council

Comment Excerpt Text:

The analysis should clearly state the differences in expected impacts between HVAC vs. HVDC cabling and how that interacts with small, medium, or large offshore substations in terms of impacts to fish, invertebrates, EFH, and fisheries. For example, different configurations of cables and substations will alter interarray cable layouts and the width of export cable corridors, potentially running cables through additional important habitats and fishing locations.

Comment Number: BOEM-2024-0008-0633-0022
Commenter Type: Federal Agency
Organization: Mid-Atlantic Fishery Management Council and New England Fishery Management Council

Comment Excerpt Text:

The EIS should thoroughly describe the commercial and recreational fisheries that may be impacted by the export cable corridor and within the lease area. These separate components of the project are likely to impact different fisheries in different ways.

Comment Number: BOEM-2024-0008-0633-0023
Commenter Type: Federal Agency
Organization: Mid-Atlantic Fishery Management Council and New England Fishery Management Council

Comment Excerpt Text:

The EIS should not imply that fishermen are likely to adapt by switching gear types and/or target species. This may not be feasible given the high cost, potentially lower prices, and different permits that would be required. Such adaptation would only occur over the longer term and may require fishery management changes. It should not be assumed that fisheries management will adapt in any particular way as fisheries management must achieve a number of varied objectives and offshore wind energy development is just one consideration.

Comment Number: BOEM-2024-0008-0633-0024
Commenter Type: Federal Agency
Organization: Mid-Atlantic Fishery Management Council and New England Fishery Management Council

Comment Excerpt Text:

We continue to have significant concerns about the cumulative impacts of offshore wind development on fishery independent surveys. Major negative impacts to these surveys would translate into greater uncertainty in stock assessments, the potential for more conservative fisheries management measures, and resulting impacts on fishery participants and communities.

Comment Number: BOEM-2024-0008-0648-0001
Commenter Type: Individual
Commenter: Brooke A

Comment Excerpt Text:

The offshore wind turbines are having a devastating impact on our marine life and jeopardizing thousands of fishing families along the East Coast. How will our region survive without a thriving fishing industry? There's evidence that these windmills interfere with radar systems, posing risks during emergencies at sea. It's disheartening that your company is willing to come to the East Coast and disrupt tens of thousands of lives in the pursuit of short-term productivity from these windmills, which are predicted to be obsolete in just a decade. This approach is essentially harming our oceans.

Comment Number: BOEM-2024-0008-0660-0005
Commenter Type: Individual
Commenter: Jaime Mirabella

Comment Excerpt Text:

Potential permanent disruption to fishing industry.

Comment Number: BOEM-2024-0008-0808-0006
Commenter Type: Individual
Commenter: Dennis De Forest

Comment Excerpt Text:

The claim of job creation comes with job losses in the fishing communities.the New York Bight is prime fishing grounds for commercial and recreational fishermen all along the east coast and to put thousands of turbines in our oceans is insane it will affect our food supply,our national security,and the health and safety of anyone who navigates our oceans

Comment Number: BOEM-2024-0008-0813-0005
Commenter Type: Individual
Commenter: Laurie Maxwell

Comment Excerpt Text:

NJ Fishing industry is strong and centered in these waters. Scallop fisherman have already noticed a large percent of empty shells post survey where their prized shellfish used to be plentiful. Placing OSW turbines 8 miles offshore will kill a New Jersey food resource!

Comment Number: BOEM-2024-0008-0821-0002
Commenter Type: Individual
Commenter: Sue Liebross

Comment Excerpt Text:

Fishing regulations have only become stricter

Comment Number: BOEM-2024-0008-0837-0004
Commenter Type: Individual
Commenter: Chris Monahan

Comment Excerpt Text:

The local fishing industries could also suffer due to restricted area access and ecological changes from turbine operations.

Comment Number: BOEM-2024-0008-0861-0002
Commenter Type: Individual
Commenter: Suzanne Bibbo

Comment Excerpt Text:

Our fishing industry and seafood supply will be decimated.

Comment Number: BOEM-2024-0008-0922-0002
Commenter Type: Individual
Commenter: John Maxwell

Comment Excerpt Text:

NJ Fishing industry is strong and centered in these waters. Scallop fisherman have already noticed a large percent of empty shells post survey where their prized shellfish used to be plentiful. Placing OSW turbines 8 miles offshore will kill a New Jersey food resource!

Comment Number: BOEM-2024-0008-0928-0012
Commenter Type: State Government
Organization: NJDEP

Comment Excerpt Text:

As the Environmental Review for the ASOW North project is planned, BOEM should look for opportunities to facilitate interagency coordination of the Fisheries Monitoring Plan (FMP) for ASOW . Effective collaboration between BOEM, NOAA, ROSA, states, regional research funding initiatives, and developers on FMPs can save time, money, and improve the utility of the information produced. As more states include a requirement for regional research funding in their power purchase agreements, regulators must consider whether information needs are better met with a regional-scale assessment or individual project monitoring. Regional studies offer the potential to improve cumulative effects assessment through the establishment of thresholds and land use plans.{{Footnote 2: Connelly, R.B., 2011. Canadian and international EIA frameworks as they apply to cumulative effects. Environmental Impact Assessment Review, 31(5), pp.453-456}} A regional approach may also be more effective at mitigating survey impacts and detecting changes in resources. Other possible advantages of planning regionally rather than project-by-project include avoiding data-rich information-poor surveys, reducing the burden of protected species permitting, and reducing survey-induced impacts on living resources. Coordination could begin with considering what the information needs are for decision making and aligning the requirements of all the regulators and the timelines of project development and state and federal permitting.

Comment Number: BOEM-2024-0008-0928-0006
Commenter Type: State Government
Organization: NJDEP

Comment Excerpt Text:

Marine Resources

The Marine Resources Administration (MRA) is tasked with maximizing the recreational and commercial use of fish, habitats, shellfish, and fisheries for future generations. These comments are offered to support BOEM's efforts to identify potential impacts and mitigation options and improve the effectiveness of our combined efforts.

Comment Number: BOEM-2024-0008-1007-0020
Commenter Type: State Government
Organization: New York State

Comment Excerpt Text:

d. Potential conflicts and impacts with commercial and recreational fishing.

Comment Number: BOEM-2024-0008-1008-0004
Commenter Type: Individual
Commenter: John Casagrande

Comment Excerpt Text:

Many fisheries will cease to exist, and the economic impact of the elimination of certain recreational and commercial fisheries has not been studied.

Comment Number: BOEM-2024-0008-1010-0018
Commenter Type: Local Government
Organization: Cape May County, NJ

Comment Excerpt Text:

The Mid-Atlantic exhibits a unique seasonal phenomenon referred to as the Cold Pool in which warm and cold-water temperatures are horizontally stratified along the continental shelf. This drastic difference between cold and warm water drives a thriving ecosystem that supports diverse and abundant species. Fisherman can catch both warm and cold-water fish and shellfish simply by adjusting the depth of their gear. A Rutgers study in 2021 writes that "the scale of these wind farms has the potential to alter the unique and delicate oceanographic conditions along the expansive Atlantic continental shelf, a region characterized by a strong seasonal thermocline that overlies cold bottom water, known as the "Cold Pool." The seasonal characteristics of the Cold Pool are "associated with and drivers of important biological and ecological processes that support key species of commercial and recreational importance." [Footnote 13: Offshore Wind Energy and the Mid-Atlantic Cold Pool: A Review of Potential Interactions]

Comment Number: BOEM-2024-0008-1069-0012
Commenter Type: Advocacy Group
Organization: Clean Ocean Action

Comment Excerpt Text:

NOAA has reported that offshore wind activities will increase uncertainty in assessments for fisheries and endangered species consultation, limiting the agency's ability to improve upon existing data:

"By disrupting NOAA Fisheries survey programs and the advice that depends upon them, regional wind development will result in major adverse impacts on U.S. fisheries stakeholders, including fishermen and fishing communities, and the
American public who consume American seafood and who also expect the recovery and conservation of endangered species and marine mammals."

Comment Number: BOEM-2024-0008-1094-0007
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

Proposed action will destroy and decimate the livelihoods of commercial fishers to the detriment of all citizens and cost of such destruction is not accurately measured.

NJ commercial fishers are denied equal protection of law in that mitigation and remediation funds are less than similarly situated commercial fishers in other states.

Failure and refusal of NJ to protect commercial fishers is a dereliction of duty which the federal actors exploit but should correct.

Proposed action fails to consider and measure the destruction of commercial fishing as an impact on a critical food source to the harm of all citizens.

Comment Number: BOEM-2024-0008-1106-0013
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

Fisheries/Socioeconomics
The project area overlaps with important high value fisheries. There is significant overlap with the surfclam fishery out of Atlantic City within the lease area, and with the monkfish and dogfish gillnet fishery out of Point Pleasant along the export cable corridors. As mentioned above, the Project area overlaps with several NJ Prime Fishing Areas which have a demonstrable history of supporting a significant local intensity of recreational or commercial fishing activity. Several artificial reefs are also within and near the Project area which also provide important fishing locations. Economic and social impacts to these fisheries due to the construction and operation of the Project should be clearly evaluated within the EIS.

Comment Number: BOEM-2024-0008-1106-0014

Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

The Commercial and Recreational Fishing Affected Environment section of the EIS should comprehensively describe all commercial and recreational (party/charter and private angler) fisheries that may be affected by the Project; historic and recent fishery landings, revenue, and effort; fishery effort within and reliance upon operations within the project area, including the number of vessels and trips, gear types used, and dependency upon fishing within the project area; shoreside support services affected by the project such as dealers, processors, distributors, suppliers, etc.; and coastal communities dependent on fishing operations within the project area. Such data for vessels permitted by the Greater Atlantic Regional Fisheries Office (GARFO) are available on our website [Footnote 4: https://www.fisheries.noaa.gov/resource/data/socioeconomic-impacts-atlantic-offshore-wind-development?utm_medium=email&utm_source=govdelivery] or via a specific data request submitted to NMFS.GAR.Data.Requests@noaa.gov. Additionally, we recommend the EIS include data from all fisheries that may be affected in the lease area and cable corridor(s), including state-permitted fisheries (e.g., whelk, conch), fisheries managed by the Atlantic States Marine Fisheries Commission (e.g., Atlantic menhaden) and by the NMFS Southeast Regional Office (e.g., bullet and frigate mackerel, wahoo, dolphin, etc.), and highly migratory species (e.g., tuna, swordfish, sharks) managed by the NMFS Office of Sustainable Fisheries. Consideration of data across a broad time frame (10 years or more), including data from the most recent 2 years, is necessary to reflect both recent operations and annual fluctuations in fishing operations due to changing environmental conditions, market price, and management measures. In evaluating the use of existing data sources, please refer to the materials provided in the Additional Information section, including the January 2021 Fisheries Socioeconomic Information Needs Checklist and associated data limitations.

Comment Number: BOEM-2024-0008-1106-0046
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

- Displacement or alteration of fishing activity that may impact protected species interactions including recreational fishing, entanglement with gear, etc.;

Comment Number: BOEM-2024-0008-1106-0048
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

- Direct and cumulative impacts to commercial and recreational fisheries including loss of access to important fishing areas due to the presence of structures; shifts from one fishery to another; displacement of fishing activities and resulting increased gear conflicts, bycatch, catch rates, and fishing pressure in other locations; changes to time and area fished, gear type used, fisheries targeted, and landing ports; and increased fishing effort due to fishing in less productive areas;

Comment Number: BOEM-2024-0008-1106-0049
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

- Socio-economic impacts on fishing entities and communities that cannot easily relocate fishing activity due to cultural norms (fishing grounds claimed or used by others), cost limitations (too expensive to travel greater distances to other fishing areas), and other relevant limiting factors such as fishing permits and associated regulations;

Comment Number: BOEM-2024-0008-1106-0050
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

- Reduced regional scientific survey access to Project areas and increased uncertainty in associated stock assessments and impacts to fishery operations;

Comment Number: BOEM-2024-0008-1106-0055
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

- Increased vessel costs from increased insurance rates to fish within wind farms or form additional fuel required to transit around wind farms or search for new fishing locations;

Comment Number: BOEM-2024-0008-1106-0057
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

- Analysis of impacts on fisheries dependent data collections (e.g., landings, biological samples, and observer data) due to potential changes in effort including potential changes in mortality rates for target and non-target species and potential fisheries interactions with marine mammals and threatened and endangered species;

Comment Number: BOEM-2024-0008-1106-0058
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

- Changes in fisheries dependent data collections on stocks expected to be impacted by offshore wind development and on anticipated displacement of fishing operations including how these effects impact specific stock assessments; and

Comment Number: BOEM-2024-0008-1106-0059
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

- Impacts to trust resources and fishing communities should include a discussion and evaluation of the lost ecological, social, and economic functions and values resulting from those impacts including loss of fisheries revenue, conservative quotas in response to reduced scientific survey access, increased uncertainty in stock assessments, and more.

Comment Number: BOEM-2024-0008-1106-0067
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

In regards to fisheries data, despite the acknowledged limitations [Footnote 12: See the discussion on our webpage (https://media.fisheries.noaa.gov/2022-02/Socioeconomic-InfoNeeds-OSW- GARFO.pdf) and for our socioeconomic impact reports for each lease area (available at https://www.fisheries.noaa.gov/resource/data/socioeconomic-impacts-atlantic-offshore-wind-development?utm_medium=email&utm_source=govdelivery)], we rely on Vessel Trip Reports (VTRs) as the best available source of area-based data for all commercial and party/charter fisheries managed by GARFO. Both vessel monitoring system (VMS) and automatic identification system (AIS) data provide higher resolution spatial data, but such sources are not adequate to provide information on all commercial fisheries or fishing vessels or fishery landings and revenue. When using these data to analyze the impacts of the proposed Project, BOEM should recognize such limitations and tailor impact conclusions based on the data used. Care should be taken to put operations into the proper context in future analyses to avoid mischaracterizing fishing operations and potential impacts associated with the proposed Project.

Comment Number: BOEM-2024-0008-1108-0047
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

Marine Life
- The COP indicates a number of recreational and commercially important fisheries, as well as endangered species and essential fish habitat designated within the lease area. Careful consideration should be given to determine if the Project would result in:
- Increased risk of vessel strikes due to modifications in navigable patterns;
- Noise-related impacts to species due to pile driving and wind turbine operations;
- Disruption of benthic habitat or conversion of habitat types;
- Displacement of species from preferred habitats, or increased stress which may lead to injury or mortality.
- While the COP outlines many of these considerations, a more detailed quantitative evaluation is warranted in the EIS.

Comment Number: BOEM-2024-0008-1111-0015

Commenter Type: Advocacy Group
Commenter: Jack Fullmer
Organization: New Jersey Council of Divers and Clubs

Comment Excerpt Text:

Sport divers are also fishermen (spearfishing) and the NJCD&C is concerned with the impact of this industrialization of the ocean, on fish, and how it impacts recreational and commercial fisheries. Generally, fish are attracted to structure, and piled jacket turbine construction may be better than monopile turbines for that purpose.

Comment Number: BOEM-2024-0008-1111-0017
Commenter Type: Advocacy Group
Commenter: Jack Fullmer
Organization: New Jersey Council of Divers and Clubs

Comment Excerpt Text:

Commercial fishermen as well as party and charter boats are concerned about snagging electrical cables, wind turbines, or concrete mattresses with the resulting entanglement and gear loss.

Comment Number: BOEM-2024-0008-1111-0003
Commenter Type: Advocacy Group
Commenter: Jack Fullmer
Organization: New Jersey Council of Divers and Clubs

Comment Excerpt Text:

Shipwrecks are the reefs of NJ, a multi-use resource that play an important role as a fishery resource, a diving resource, and a possible, if little utilized that way, archeological and historic resource. The hard habitat of the wrecks allows food such as mussels to attach, and hiding places and shelter for marine life. Highly sought-after fish species such as Black Sea Bass, Tautog, and Fluke feed and often live on them, and shipwrecks are intensely fished by both commercial and recreational boats. The NJCD&C strongly believes that shipwrecks and artificial reefs are poorly protected by this DEIS and BOEM, especially during the construction phase.

Comment Number: BOEM-2024-0008-1115-0002
Commenter Type: Local Government
Commenter: James G Borowski
Organization: Borough of Lavallette

Comment Excerpt Text:

The proposed Monmouth export cable and the Northern Export Cable routes are in highly prolific fishing grounds. The increased turbidity and disruption of the sea bed, caused by the jetting necessary to bury these cables over their 40 miles of transit, will be a loss to both recreational and commercial fisheries alike. The construction of 157 wind turbines and various offshore substations will further stress this vital industry.

Comment Number: BOEM-2024-0008-1122-0002
Commenter Type: Individual
Commenter: Anonymous

Comment Excerpt Text:

NO MORE LOCAL CAUGHT SEAFOOD

"An industry that feeds you is an industry worth fighting for!"

Comment Number: BOEM-2024-0008-1138-0006
Commenter Type: Individual
Commenter: Kathleen Harper

Comment Excerpt Text:

Also my concern is about our fishing industry, they keep promising jobs and jobs but there are so many thousands of jobs that are going to be lost if we lose our fishing industry, and if these turbines are put in and in ten years they find they are not working or they need to decommission them, they are still going to leave those bases at the bottom so the men and women are never going to be able to fish on our shores again. These are hard working people that do not deserve to lose their livelihood.

Comment Number: BOEM-2024-0008-1143-0002
Commenter Type: Individual
Commenter: Sylvia Lockwood

Comment Excerpt Text:

There was the document that came out, it was the NOAA technical memorandum and that's MNFSNE291, exposes major gaps in knowledge throughout the document regarding our fisheries and ocean environment.

Comment Number: BOEM-2024-0008-1150-0003
Commenter Type: Individual
Commenter: Laurie Maxwell

Comment Excerpt Text:

oh, let's talk about fishing. Scallop fisherman are opening up, studies have shown and there is nothing there, there is less.

A.3.8 Cultural, Historical, and Archaeological Resources

Comment Number: BOEM-2024-0008-0491-0002
Commenter Type: Individual
Commenter: James Snyder

Comment Excerpt Text:

The Atlantic Shores Project will be situated in such close proximity to Long Beach Island that it will dominate the seascape, adversely affecting the views from pristine shoreline and historical sites where seascapes are an essential part of their charm and character. Examples include Barnegat Light Lighthouse, Barnegat Light State Park and historical sites in other downs on Long Beach Island. The visual impact

studies done for this project make this very clear.

Comment Number: BOEM-2024-0008-0611-0029
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

The EIS should disclose the archeological importance of now-submerged ancient Native American artifacts in the lease area and cable routes and how they will be protected. Previous Marine Archeological Resource Assessments in the area have indicated that such artifacts date to the Plestocene period, and therefore may be of great historical significance, potentially shedding light on the origin of the first humans to populate North America. As such, this is a very important issue that must be fully disclosed and properly addressed. Specifically, the EIS needs to provide a scientific sediment vibration analysis showing how prior proposed 50 or 100 meter buffer zones will prevent the destruction of such artifacts from the pile driving.

Comment Number: BOEM-2024-0008-0653-0006
Commenter Type: Individual
Commenter: Michael Devlin

Comment Excerpt Text:

More than scenery, the Jersey shore preserves our history and culture. No one would put WTGs on the rim of the Grand Canyon or on top of El Capitan in the name of
sustainable power generation. These beaches and barrier islands are part of our history and culture. The same views that were visible hundreds of years ago to the first nations people, the Lenape, and those early Americans for whom our Barnegat Lighthouse was built to protect from shipwrecks is here for generations to enjoy. The National Parks Service understands this and has a major role in cultural heritage preservation. The Jersey shore beaches are our Grand Canyon and El Capitan and the vast views provided by those who enjoy these beaches and ocean views should be as aggressively preserved
as any national park.

Comment Number: BOEM-2024-0008-0761-0002
Commenter Type: Individual
Commenter: John Deputato

Comment Excerpt Text:

You know it's kind of ironic - that when you live in an historic area, any building or renovations must conform to code in order to preserve the historic look and beauty of the town - yet BOEM feels its ok to place 1000 ft Turbines in the ocean less than 9 miles off the coast.

Comment Number: BOEM-2024-0008-0837-0006
Commenter Type: Individual
Commenter: Chris Monahan

Comment Excerpt Text:

The construction of large-scale wind facilities could also impact the cultural heritage of the area, disrupting not only the natural landscape but also the historical and cultural ethos of coastal communities.

Comment Number: BOEM-2024-0008-1040-0013
Commenter Type: Individual
Commenter: Denise Boccia

Comment Excerpt Text:

During the historic preservation act process, how will the BOEM protect against the destruction of now submerged, native American ancient artifacts from the pile driving?

Comment Number: BOEM-2024-0008-1105-0001
Commenter Type: Federal Agency
Commenter: Jennifer Maver
Organization: National Park Service

Comment Excerpt Text:

We have an initial request we hope you will consider while the draft and final Environmental Impact Statements (EISs) are prepared that would aid NPS in our role and the public overall in reviewing and commenting on materials for the projects. NHLs, historic lighthouses under NHLPA, as well as historic properties eligible and listed on the National Register of Historic Places should be identified on all the project maps that show the study area.

Comment Number: BOEM-2024-0008-1105-0010
Commenter Type: Federal Agency
Commenter: Jennifer Maver
Organization: National Park Service

Comment Excerpt Text:

The NPS LWCF State and Local Assistance Program provides matching grants to states and local governments for the acquisition and development of public outdoor recreation areas and facilities. Section 6(f)(3) of the LWCF Act requires that no property acquired or developed with LWCF assistance shall be converted to other than public outdoor recreation uses without the approval of the Secretary of the Department of the Interior. Typically, a conversion of LWCF lands will require the project proponent to supply a replacement parcel of land that is equivalent in value, location, and usefulness.

As noted above, the NPS recommends BOEM and the developer provide more detailed information regarding proposed landfall locations so it is possible to ascertain whether LWCF sites would be impacted. NPS will provide technical assistance locating LWCF properties and facilitating discussion with the New Jersey and/or New York State Liaison. If LWCF sites are identified, additional review may be necessary to determine the potential for conversion.

Comment Number: BOEM-2024-0008-1105-0011
Commenter Type: Federal Agency
Commenter: Jennifer Maver
Organization: National Park Service

Comment Excerpt Text:

Moreover, we ask that NPS be contacted as soon as possible should there be a change to the proposed onshore locations, or should new locations be proposed so that we may review the new locations for any

potential conflicts with any NPS programs or resources.

Comment Number: BOEM-2024-0008-1105-0012
Commenter Type: Federal Agency
Commenter: Jennifer Maver
Organization: National Park Service

Comment Excerpt Text:

As noted above, additional information on the proposal landfall, transmission route, and substation upgrades is necessary to ascertain whether FLP Program parcels may be impacted by the projects so that appropriate steps can be taken.

Comment Number: BOEM-2024-0008-1105-0013
Commenter Type: Federal Agency
Commenter: Jennifer Maver
Organization: National Park Service

Comment Excerpt Text:

NPS encourages BOEM and the developers to fully disclose the extent to which additional onshore connections and associated infrastructure may be possible or likely in the future. NPS stands ready to assist in identifying LWCF sites and FLP parcels in potential onshore connection locations and to explain the processes that would have to occur should one of these locations be proposed.

Comment Number: BOEM-2024-0008-1105-0002
Commenter Type: Federal Agency
Commenter: Jennifer Maver
Organization: National Park Service

Comment Excerpt Text:

Coastal NHLs, NHLPA historic lighthouses, and National Register listed and eligible properties can be adversely affected by the presence of wind turbine generators (WTGs) and the associated infrastructure contained in a wind farm project. NPS appreciates BOEM's efforts to analyze and disclose impacts and effects to historic properties, including the evaluation of impacts on both the physical elements and features that make up a landscape or seascape as well as the aesthetic and experiential aspects of the seascape or landscape that make it distinctive as viewed from the key observation points (KOPs).

Comment Number: BOEM-2024-0008-1105-0003
Commenter Type: Federal Agency
Commenter: Jennifer Maver
Organization: National Park Service

Comment Excerpt Text:

The NPS has identified potential areas of interest and concern regarding the Atlantic Shores North Wind Project.
NPS requests that BOEM considers the following comments and incorporates both our recommendations and the baseline information we provide herein as BOEM identifies and analyzes impacts under NEPA and carries out consultation under NHPA.

Comment Number: BOEM-2024-0008-1105-0005
Commenter Type: Federal Agency
Commenter: Jennifer Maver
Organization: National Park Service

Comment Excerpt Text:

The NPS recommends that primary simulations should always represent the worst-case scenario as far as visibility. We advise that additional simulations are provided to show the range of visibility under a variety of conditions. It is recognized that atmospheric conditions over the ocean may reduce visibility in under some conditions. However, since visual simulations underrepresent the actual visibility of proposed changes, artificially adding atmospheric haze further reduces the effectiveness of the simulations and should be avoided.

Comment Number: BOEM-2024-0008-1105-0006
Commenter Type: Federal Agency
Commenter: Jennifer Maver
Organization: National Park Service

Comment Excerpt Text:

NPS encourages BOEM to assess the potential effects of the undertaking on NHLs and other National Register listed and eligible properties and resolve any adverse effects when possible, through avoidance, minimization, and mitigation measures. In the case of the Atlantic Shores Wind Projects, NPS encourages measures to protect the night sky.

Comment Number: BOEM-2024-0008-1105-0009
Commenter Type: Federal Agency
Commenter: Jennifer Maver
Organization: National Park Service

Comment Excerpt Text:

It is our understanding that there are six proposed landfall sites, three in New York and three in New Jersey, and that the onshore routes from the landfall sites to the Points of Interconnection (POI) are currently being evaluated. We recommend that BOEM and the developer provide more specific information on potential landfall locations and the proposed routing and any upgrades of the transmission line and related infrastructure as it becomes available. This information is necessary to ascertain whether any NPS program lands, such as those acquired and protected under the Land and Water Conservation Fund (LWCF) State and Local Assistance Program or the Federal Lands to Parks (FLP) Program, may be impacted by the proposed projects and require additional action.

Comment Number: BOEM-2024-0008-1108-0029
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

Tribal Coordination
- The COP describes efforts by Atlantic Shores to engage tribes that claim cultural affiliation to the potentially affected area including: the Narragansett Indian Tribe, the Shinnecock Indian Nation, the

Lenape Tribe of Delaware, the Delaware Nation, Oklahoma, the Delaware Tribe of Indians, the Absentee Shawnee Tribe of Indians of Oklahoma, the Mohican Nation StockbridgeMunsee Band, the Shawnee Tribe, the Stockbridge Munsee Community, New York, the Nanticoke Lenni-Lenape Tribal Nation, Ramapough Lenape Nation, the Powhatan Renape Nation, and the Unkechaug Indian Nation.

Comment Number: BOEM-2024-0008-1108-0030
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

- EPA commends the consultation and engagement efforts by the project proponent to date and we encourage continued outreach and involvement of tribes in evaluating terrestrial and marine archaeological resources, designing marine surveys, and interpreting results. We also recommend that tribes be invited to participate in the development of an unanticipated discovery plan (UDP) for offshore and onshore construction activities.

Comment Number: BOEM-2024-0008-1111-0013
Commenter Type: Advocacy Group
Commenter: Jack Fullmer
Organization: New Jersey Council of Divers and Clubs

Comment Excerpt Text:

The artifact training program for contractors, project staff, and barge captains by a qualified u/w archaeologist is a good idea. Atlantic Shores may also want to consider a tour of the NJ Shipwreck Museum at Info Age, 220 I Marconi Rd, Wall Township for artifact identification.

Comment Number: BOEM-2024-0008-1111-0009
Commenter Type: Advocacy Group
Commenter: Jack Fullmer
Organization: New Jersey Council of Divers and Clubs

Comment Excerpt Text:

Although within easy SCUBA diving depth, apparently none of the side scanned targets have been dove yet by u/w archaeologists to determine significance and possible National Register eligibility. Since BOEM decided to hide the location of these targets by leaving their location out of the DEIS, shipwrecks whose identity and history may already be known cannot be determined from this DEIS. Most of the research done on shipwrecks off the Jersey coast is done by the sport diving community.

Comment Number: BOEM-2024-0008-1158-0001
Commenter Type: Advocacy Group
Commenter: Michael Skelly
Organization: Unitarian Universalist Faith Action

Comment Excerpt Text:

Our faith calls upon us to have respect for the interdependent web of all existence of which we are a part. Therefore, these wind energy projects and the environmental impact that they pose are a direct interest to

us. We support BOEM's scoping plan, the use of the envelope approach and multiple simultaneous reviews and public participation process as effects environmental, societal and historical impacts and many others.

A.3.9 Demographics, Employment, and Economics

Comment Number: BOEM-2024-0008-0004-0010
Commenter Type: Individual
Commenter: Noel Quinn

Comment Excerpt Text:

Lastly, I have never seen a careful "balance sheet " analysis of the carbon costs of fossil vs windmills vs solar power.

Much of the wind power can be replaced with nuclear power which would produce power 24/7 without the issue of intermittent power availability of solar which is only created during the day.

Also, if you are going to use solar/wind there is the need for large batteries for storage for use at night; this should be part of the energy picture and accounted for whilest making comparisons.

Comment Number: BOEM-2024-0008-0005-0008
Commenter Type: Individual
Commenter: James Binder

Comment Excerpt Text:

Recent actions by wind developers cancelling projects as a result of higher costs has led to the need for an updated economic analysis of these projects to better determine if the expected benefits are achievable. NY and NJ have taken actions to appease developers by allowing rebid of existing projects at higher costs. These actions negatively impact the electric rate payers. When considering the potential benefits of the Proposed Action, please update the economic analyses to include the recent rise in interest rates for borrowing, inflation and increased cost of equipment and labor, and supply chain issues and project delays.

Comment Number: BOEM-2024-0008-0008-0001
Commenter Type: Individual
Commenter: Robert Maryott

Comment Excerpt Text:

This project is not right for New Jersey and frankly does not make any sense without the massive government subsidies which will eventually cease and then the burden will fall upon taxpayers.

Comment Number: BOEM-2024-0008-0009-0002
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

In addition to environmental concerns, there are economic implications that must be carefully evaluated. The high initial costs associated with offshore wind projects often result in increased energy prices for

consumers. The maintenance and repair of offshore turbines can be prohibitively expensive, potentially burdening taxpayers and utility customers with additional costs in the long run. Have studies been done to determine the cost, schedule, and resources to maintain these turbines?

Comment Number: BOEM-2024-0008-0053-0004
Commenter Type: Individual
Commenter: Ben Vitale

Comment Excerpt Text:

The economic, technological, and labor activity associated with wind power is considerable. Our nation is well behind in this area, and that's both a missed opportunity for ourselves, and a competitive disadvantage with other nations.

Comment Number: BOEM-2024-0008-0056-0002
Commenter Type: Individual
Commenter: Denise Lytle

Comment Excerpt Text:

Transitioning to a clean energy future isn't just a win for the environment it's a win for local businesses, the many union members who will be put to work, and to New Jersey's overall economy. The cost of wind energy is stable. Wind is free, so the cost of energy is consistent once wind energy installations are built. In contrast, fossil fuels are subject to volatile price swings and global events that create unwelcome surprises on energy bills. Wind energy boosts U.S. economic growth and creates local union jobs. As wind energy grows, so do the positive economic impacts. In 2021, new wind projects added $20 billion to the country's economy. Wind turbine technician is the fastest growing job in the U.S. and is projected to grow by 44% in the next decade. Wind energy supports local communities. Wind can power our homes and our way of life. Wind provides a stable source of tax revenue, delivering an estimated $1.9 billion in state and local tax payments and land-lease payments every year. This is extra revenue that communities can put towards schools, reducing tax-burdens for homeowners, and boosting local infrastructure projects.

Comment Number: BOEM-2024-0008-0062-0003
Commenter Type: State/Local Elected Official
Organization: New Jersey's 9th Legislative District Delegation

Comment Excerpt Text:

Last, but certainly not least, many ratepayers are disconcerted by the very real potential for increases in their utility costs that are likely to be imposed to subsidize the costs associated with offshore wind turbines. Utility cost increases serve as a regressive tax, disproportionately impacting ratepayers based on their income and ability to pay, especially seniors living on fixed incomes. New Jersey already has a high cost of living, and its residents cannot afford policies which exasperate the currently unacceptable situation that compels many residents to apply for federal and state assistance programs.

Comment Number: BOEM-2024-0008-0081-0006
Commenter Type: Individual
Commenter: Patrick Cozza

Comment Excerpt Text:

My understanding is due to the spiraling costs of instillation, a NJ homeowner can expect to pay MORE not less for their electricity created by turbines.

Comment Number: BOEM-2024-0008-0111-0002
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

Jobs & Economy
- Transitioning to a clean energy future isn't just a win for the environment it's a win for local businesses, the many union members who will be put to work, and to New Jersey's overall economy.
- The cost of wind energy is stable. Wind is free, so the cost of energy is consistent once wind energy installations are built. In contrast, fossil fuels are subject to volatile price swings and global events that create unwelcome surprises on energy bills.
- Wind energy boosts U.S. economic growth and creates local union jobs. As wind energy grows, so do the positive economic impacts. In 2021, new wind projects added $20 billion to the country's economy. Wind turbine technician is the fastest growing job in the
U.S. and is projected to grow by 44% in the next decade.
- Wind energy supports local communities. Wind can power our homes and our way of life. Wind provides a stable source of tax revenue, delivering an estimated $1.9 billion [Link: https://cleanpower.org/facts/wind-power/] in state and local tax payments and land-lease payments every year. This is extra revenue that communities can put towards schools, reducing tax-burdens for homeowners, and boosting local infrastructure projects.

Comment Number: BOEM-2024-0008-0121-0001
Commenter Type: Individual
Commenter: Enrique Nunez

Comment Excerpt Text:

I am strongly in favor of offshore wind. I urge you to proceed with the environmental impact statement for the Atlantic Shores offshore wind project. This project will help power over 1 million homes and bring hundreds of well paying jobs to our communities.

Comment Number: BOEM-2024-0008-0126-0001
Commenter Type: Individual
Commenter: Richard Osler

Comment Excerpt Text:

Please do not build these turbines within visible distance of Long Beach Island. The island has been my refuge for 57 years. It would be the sole reason I chose to retire in New Jersey. If the turbines are erected I will sell my beloved beach house I worked my life to purchase 6 years ago. I believe in man made climate change but cannot see the negative to positive ratio of this project pointing to forging ahead with destroying our shoreline. NewJersey will lose a life long taxpayer with a business here and 2 homes.

Comment Number: BOEM-2024-0008-0135-0001
Commenter Type: Individual
Commenter: Enrique Nunez

Comment Excerpt Text:

Offshore wind has the potential to generate massive amounts of clean power for East Coast cities and states, increasing energy independence and decreasing reliance on fossil fuels. While there are investments to be made, the long-term economic benefits of this renewable energy source are tremendous - creating thousands of new manufacturing and operations jobs while driving down electricity costs over time.

Comment Number: BOEM-2024-0008-0138-0014
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

The COP fails to demonstrate that the project will not significantly drive up the cost of electricity for ratepayers in New Jersey.

Comment Number: BOEM-2024-0008-0138-0020
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

The COP does not consider the actual guarantee of jobs presented in the PPA agreements with the NJ BPU. According to the PPA solicitation 1 and 2, the GUARANTEE of jobs by the wind developers is minimal. Jobs related to Salem County wind port and Paulsboro facility are heavily funded by tax dollars and NJ rate payers. This is nothing more than a transfer of money in the form of increased taxes and utility rates from residents and businesses to the pockets of union members.

Comment Number: BOEM-2024-0008-0138-0037
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

The ASOWNJ COP ignores the major impacts related to Climate Justice Areas. Some of the worse visual impact changes and disruption to everyday living, increased pollution, vessel and road traffic, construction and operation noise, greatly reduced enjoyment of the natural free beaches in Atlantic City and increased energy costs as a percentage of income will occur in many of the 87 locations identified as environmental climate justice areas based on minority and low-income populations. As mentioned in other areas of these comments, the ASOWNJ project will not reduce the flooding, rising seas and severe climate events at or near the residences or recreational areas used by the minorities and low-income populations. Wind Developers and Government Agencies have ignored the Environmental Justice Area in Brigantine, NJ. Visual Impact Assessment - Atlantic Shores Offshore Wind (boem.gov)[Link: https://www.boem.gov/sites/default/files/documents/renewable-energy/state-activities/Appendix-II-M1-Visual-Impact-Assessment_0.pdf]

Comment Number: BOEM-2024-0008-0138-0038
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

The great majority of green energy jobs related to offshore wind will not be located in Climate Justice Areas in Atlantic County but in other counties in New Jersey. The jobs held by many residents of Atlantic City are associated with the tourist industry which will be negatively impacted by the offshore wind projects. In addition any positive impact related to the jobs must be offset with the public money being used to "purchase" the jobs.

Comment Number: BOEM-2024-0008-0138-0039
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

As mentioned in other sections of this document, construction and operation of offshore wind projects (offshore and on land) in Atlantic City will provide disruption to underserved minority and low-income residential neighborhoods. Trenching for and operation of underground high voltage cables in the city neighborhoods and next to a public school is especially concerning.

Comment Number: BOEM-2024-0008-0138-0041
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

he ASOWNJ COP ignores the project's impact to casino tourism. The beaches and ocean view are an attraction and provide a competitive advantage for Atlantic City casinos. Atlantic City is known as a waterfront destination city for casino tourists as a result. Atlantic City remains the 2nd largest casino industry behind Las Vegas. ASOWNJ project and other planned offshore wind projects will have a major adverse impact on the view from the casino ocean front rooms, restaurants, beach bars and other ocean front activities which will be dominated by a large and highly visible array of wind turbine generators. The state of the "bricks and mortar" casino industry in Atlantic City is fragile.

Comment Number: BOEM-2024-0008-0138-0043
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

The analysis reveals that residential property values are adversely and measurably impacted by the proximity of the industrial- scale of planned wind energy turbine projects. There will also be a serious impact on the use and enjoyment of many homes in our communities. The approval of wind energy projects within such a proximity to occupied homes is tantamount to an inverse condemnation, or regulatory taking of private property rights, as the views and noise are in some respects a physical invasion resulting in a forced reduction in property values.

Comment Number: BOEM-2024-0008-0138-0008
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

The COP fails to address the project's significant and long-lasting impacts on already at-risk, minority and underprivileged populations in Atlantic City and other coastal towns in New Jersey, United States and abroad.

Comment Number: BOEM-2024-0008-0141-0002
Commenter Type: Advocacy Group
Organization: NJ ALLIANCE FOR ACTION

Comment Excerpt Text:

Offshore wind energy is also part of an economic transformation in our state and the creation of a new industry. Atlantic Shores is a part of that in its commitment to manufacturing and marshalling facilities in our state. These facilities will hopefully supply offshore wind farms up and down the East Coast.

Our state's utilities are also planning for the availability of this energy. Another part of that economic benefit will be the on land transmission capabilities that are planned and will soon be underway. They will make for a more resilient grid for our state.

Comment Number: BOEM-2024-0008-0155-0001
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

This project, will not only make my property value go down, it also has the potential to damage my home in terms of the cracks and vibrations associated with the turbines. I also will be disturbed hearing these turbines as the decimal level is about the allowed per the township. Evidence of this has already been seen in VA. Being only 9 miles off the shore in my location I am very disturbed. The area where we are from is lower income and lower educated in terms of the Jersey shore and I feel that this proposal is taking advantage of that lack of resources to these individuals. The view that this is a green project is not correct.

Comment Number: BOEM-2024-0008-0383-0002
Commenter Type: Individual
Commenter: Catherine Kulp

Comment Excerpt Text:

Wind power is inherently not a baseline power generator. This project is, at best, a supplemental power source. The amount of money spent on this project is not benefiting the taxpayers of the area. We would be better served by investing in better and cleaner baseline power sources.

Comment Number: BOEM-2024-0008-0383-0007
Commenter Type: Individual
Commenter: Catherine Kulp

Comment Excerpt Text:

We, the taxpayers, would be much better served spending our dollars on nuclear power plants , hydrogen production projects, conservation initiatives and R&D investment for futuristic clean energy production.

Comment Number: BOEM-2024-0008-0401-0001
Commenter Type: Individual
Commenter: Michael Riordan

Comment Excerpt Text:

I resided in Atlantic County from 2007 to 2012 during the economic downturn. I observed the closure of four casinos, which resulted in the loss of thousands of jobs and led to many families leaving the area. I have noticed that Atlantic Shores and the Governor have not been transparent about the windmill's impact on the local economy. The subsidized offshore wind project will increase everyone's electricity bills, and it is a waste of taxpayers' money. Therefore, I am firmly against it.

Comment Number: BOEM-2024-0008-0421-0003
Commenter Type: Individual
Commenter: Brenda Riley

Comment Excerpt Text:

Property values will decrease.

Comment Number: BOEM-2024-0008-0437-0002
Commenter Type: Individual
Commenter: Marilyn Dipaolo

Comment Excerpt Text:

This is a serious mistake that will only cause additional ecosystem disruption and negative economic repercussions.

Comment Number: BOEM-2024-0008-0452-0002
Commenter Type: Individual
Commenter: Michael Lang

Comment Excerpt Text:

Ruining the ecomony of this pristine island by the reduction of tourism, reduction in property values, loss of revenue to the state, not to mention the loss of marine life and the livelyhood of many fishermen.

Comment Number: BOEM-2024-0008-0468-0001
Commenter Type: Individual
Commenter: Concerned Citizen

Comment Excerpt Text:

Vehemently opposed. The state of NJ offering $1 billion in tax breaks to off shore wind companies over investments in NJ schools and healthcare effectively jeopardizes 1)the health and welfare of NJ citizens 2) the NJ shoreline and the protection of the coastal environment and 3) the NJ economy for years to come.

Comment Number: BOEM-2024-0008-0480-0001
Commenter Type: Individual
Commenter: Mark Licker

Comment Excerpt Text:

t will have a devastating effect on the economy of lbi. Shame on the politicians

Comment Number: BOEM-2024-0008-0488-0002
Commenter Type: Individual
Commenter: Colleen D'Abbene

Comment Excerpt Text:

The community economy, which is already fragile as it's so heavily dependent and driven by the beach season will be significantly affected. Without question, property values and tax revenue will decline.

Comment Number: BOEM-2024-0008-0491-0003
Commenter Type: Individual
Commenter: James Snyder

Comment Excerpt Text:

The proposed Atlantic Shores Project will decimate the "Viking Village" fishing fleet in Barnegagt Light, destroying local fishing employment. The Viking Village complex generates millions of revenue and has generated a name and brand recognized for quality seafood. The loss of jobs and commercial activity will negatively impact the Barnegat Light local area and will have a knock-on effect on the rest of Long Beach Island.

Comment Number: BOEM-2024-0008-0491-0006
Commenter Type: Individual
Commenter: James Snyder

Comment Excerpt Text:

The economics don't work. Because the true costs of "sunsetting" this project are not fully addressed, the ultimate cost of the Atlantic Shores Project is understated by several orders of magnitude. Very little attention has been given to obsolescence, dismantling and remediation.

Comment Number: BOEM-2024-0008-0491-0007
Commenter Type: Individual
Commenter: James Snyder

Comment Excerpt Text:

In addition, in the absence of very large subsidies from the federal government and the state of new Jersey, which may or may not be forthcoming, there is no credible economic benefit for New Jersey taxpayers and electricity consumers. The numbers simply don't work. If BEM believes they do work, BOEM should do a better job of communicating to that effect. the message isn't getting through.

Comment Number: BOEM-2024-0008-0524-0002
Commenter Type: Individual
Commenter: Sharon Mahoney

Comment Excerpt Text:

Wind energy is expensive and extremely intermittent! Ratepayers (that's all of us- residents of NJ) will be forced to take on the burden and risk. Offshore wind is a very expensive way to generate electricity, it is 2.6 times more expensive than onshore wind power. What guarantees and measurable performance can be put in place to protect the interest of the NJ residents? Also, if this project is implemented in response to Gov Murphys wind intiatives, why is it that much of this energy generated will be sent to New York for their use? If NJ residents are going to be faced with the financial burden of this project, then only NJ should receive its benefits.

Comment Number: BOEM-2024-0008-0538-0009
Commenter Type: Individual
Commenter: Mary Smith

Comment Excerpt Text:

Please do not allow these foreign companies to destroy the Jersey Shore economy! Shore towns have enjoyed years of families and ocean lovers upholding traditions and making memories.

Comment Number: BOEM-2024-0008-0550-0004
Commenter Type: Individual
Commenter: AJ Conte

Comment Excerpt Text:

Economically, the costs associated with offshore wind energy, typically borne by consumers through higher utility bills, do not justify the benefits, considering the significant environmental impacts and the availability of less intrusive renewable alternatives.

Comment Number: BOEM-2024-0008-0551-0011
Commenter Type: Advocacy Group
Organization: RODA

Comment Excerpt Text:

BOEM must fully corroborate statements by developers regarding project economics, which the public cannot do as BOEM considers this information to be confidential. It is particularly concerning to have no

independent verification of what alternatives are possible, within the bounds of project economics, given that other developers have provided incorrect information in the past and that BOEM leadership is already touting project benefits before any economic analysis whatsoever. This holds true across a range of project considerations from design and mitigation alternatives to research, monitoring, and decommissioning.
There is little peer-reviewed information regarding the economic costs and benefits of OSW. Most of the information in the public domain is generated by OSW developers or trade associations and based upon information deemed confidential so that it cannot be verified. The true ecological cost of OSW is site specific, as well as cumulative. The public must understand the overall Atlantic Shores North project cost, the amount of federal, state, or local taxpayer subsidies devoted to the project, projections of the full cost to ratepayers (including the contract price in addition to any predictions of project contingencies or overages), and portion of project costs that will accrue to foreign markets. This information is required to make even a basic informed evaluation of the project's desirability or whether BOEM's final project decision will constitute a reasoned decision among alternatives.
OSW appears to have widely different costs and benefits as compared to other renewable power sources. Multiple technologies exist at commercial scales that may have relative benefits in comparison to OSW. Depending on site-specific conditions, technology that may be inappropriate in one area due to unreasonable conflicts or environmental conditions may be the most desirable in another. A comparison of relative costs and environmental impacts of alternative technologies should be included in the EIS.

Comment Number: BOEM-2024-0008-0555-0001
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

Stop Ocean Wind Factory Construction and all Future Wind Electric Power Plants. Officials, should listen to the people and do as the people demand or those officials should be sent to prison for not upholding their oath of office. Those officials should also repay tax payers for their wasted and unwanted stupid ideas.

Comment Number: BOEM-2024-0008-0557-0004
Commenter Type: Individual
Commenter: Joseph Pallante

Comment Excerpt Text:

our electric bill will minimally triple if not more.

Comment Number: BOEM-2024-0008-0557-0007
Commenter Type: Individual
Commenter: Joseph Pallante

Comment Excerpt Text:

NO ROI report available. COSTS to install not yet understood, costs to maintain not understood.

Comment Number: BOEM-2024-0008-0560-0003
Commenter Type: Individual
Commenter: ArleneArlene Mangin

Comment Excerpt Text:

We all know that this is all about the money and when you say it is not then we all know it is double about the money. Stop your greed!

Comment Number: BOEM-2024-0008-0567-0005
Commenter Type: Individual
Commenter: Maryanne Klemmer

Comment Excerpt Text:

Also, New York State has recently pulled out of similar projects, due to the fact that they are costly and unreliable.

Comment Number: BOEM-2024-0008-0569-0003
Commenter Type: Individual
Commenter: Craig Osten

Comment Excerpt Text:

The Economic benefit of the energy produced here will not be incurred by the NJ residents who are being charged for it and facing the potential negative externalities associated with the industrialization of the shore line. In addition, I have not seen any Economic studies showing the impact on Energy and rates inclusive of the negative impact that this project will have on tourism for the NJ shore and property values.

Comment Number: BOEM-2024-0008-0569-0008
Commenter Type: Individual
Commenter: Craig Osten

Comment Excerpt Text:

Why is Atlantic shore being allowed to rebid on this project ? Why should tax payers who are likely to see their electric bills increase, have to give additional subsidies to business.

Comment Number: BOEM-2024-0008-0570-0001
Commenter Type: Individual
Commenter: Sandra Prout

Comment Excerpt Text:

No windmill off of LBI! It will ruin the environment, and is not cost-effective. Only cost effective of the taxpayers are paying most of the cost. We don't wanna pay for this.

Comment Number: BOEM-2024-0008-0575-0001
Commenter Type: Business/Trade Association
Organization: LaMonica Fine Foods, surf clam industry

Comment Excerpt Text:

LaMonica Fine Foods (LFF) is a vertically integrated seafood company that harvests and processes surfclams at a facility in Millville, NJ. Combining the captains and crew members of its clam vessel fleet, operating out of the port of Atlantic City, with the number of employees at the processing facility, LFF employs over 200 personnel. The year 2023 marked the 100-year anniversary for LFF supplying commercial clams to major global food companies.
The single biggest threat to the continued existence of this highly sustainable company is the development of offshore wind energy. Of all the potential wind energy sites that existed from the beginning of leasing by BOEM on the East coast, the Atlantic Shores North Lease Area OCS-A 0549 was recognized as the biggest threat to the Mid-Atlantic surfclam fishery since it contained within the lease area two of the most productive 10X10 nautical miles square areas where surfclam harvesting was occurring. The COP for Atlantic Shores North does not allow for safe access and operation of surfclam dredging within this wind energy site and an exclusion zone will be created.

Comment Number: BOEM-2024-0008-0581-0003
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

3. The $ and cost of these supports and lines the pockets of politicians who align with these bogus "green" causes, knowing full well the inability of the promises the turbine companies profess.

Comment Number: BOEM-2024-0008-0581-0006
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

6. Communities where there are turbines, minimal if any savings for residential costs benefits/savings have been recorded even 5 years following installation. It's irresponsible, it's not "green", it's corruption at its finest and nobody is saving $

Comment Number: BOEM-2024-0008-0582-0003
Commenter Type: Individual
Commenter: Mark Cremonni

Comment Excerpt Text:

what we do know is that electricity costs will rise, grid dependability will be diminished,

Comment Number: BOEM-2024-0008-0585-0002
Commenter Type: Individual
Commenter: Mark Weismiller

Comment Excerpt Text:

Electric rates have been projected to increase significantly year over year for 25 years, impacting NJ residents significantly. And, most of the electricity generated will go to NY residents! No studies have been done to address the impact to local NJ economies, the quality of life of NJ shore residents, shore economy and real estate, bird populations, marine life and the fishing industry.

Comment Number: BOEM-2024-0008-0586-0006
Commenter Type: Individual
Commenter: Theresa Teti

Comment Excerpt Text:

Nothing good is going to come from this. These turbines aren't made in this country. We are enriching China, Why?

Comment Number: BOEM-2024-0008-0588-0004
Commenter Type: Individual
Commenter: Kassandra Funkhouser

Comment Excerpt Text:

This project is planned closest to shore at only 8.4 miles, us locals and Jersey shore visitors alike will not only see but hear these monstrosities, what will that do to our economy, our mental and physical health?

Comment Number: BOEM-2024-0008-0589-0004
Commenter Type: Individual
Commenter: Mary Beth Feeney

Comment Excerpt Text:

Generational Fisherman livehoods are in peril, our tourism crushed, our property values destroyed and our ocean rendered lifeless.

Comment Number: BOEM-2024-0008-0590-0001
Commenter Type: Individual
Commenter: Murray Robertson

Comment Excerpt Text:

We do not want these offshore wind projects to proceed at all. I do not want my tax dollars being wasted on any project that impacts our beautiful shoreline. We have done enough damage to the land, please leave the sea alone.

Comment Number: BOEM-2024-0008-0611-0015
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

The criteria for lease area cancellation is also met regarding probable serious harm to property. In consultation with several Realtors on Long Beach Island, Save LBI conducted a study of residential property value loss based on prior studies, that concluded that the presence of visible wind turbines would result in property value loss of $1.3 billion just for the 983 ocean front properties on LBI alone. This would have a spillover effect on the rest of the properties on LBI as well as significant losses in rental income.

Another study of property values loss was done by Defend Brigantine Beach Inc. and Down Beach again based on several prior studies some of which the BOEM has cited in its EISs. It is titled "Report to Atlantic County Commissioners on Offshore Wind Developments, the Industrialization of our Ocean, and Impact to Our Local Economy, April 2024. That study concluded that: "Based on the impact of an industrialized ocean view from beach homes in Atlantic City, Brigantine, Long Port, Margate and Ventnor, total property values could be reduced by $2.2 billion, and the County, municipalities, and school districts could lose $36 million in annual taxes".

If numbers like this do not meet the property criteria for lease area termination we are not sure what would. The BOEM needs to do a quantitative analysis of residential property value loss in the EIS in order to assess whether this criteria for lease area termination is met.

Comment Number: BOEM-2024-0008-0611-0033
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

The BOEM needs to quantify the lost tourism revenue and job losses at the shore based on NOAA data bases and its own prior studies. Based on prior studies, including the BOEM sponsored University of Delaware study, the Defend Brigantine Beach organization , in its recent detailed analysis of impacts to Atlantic County concluded that 16.5 to 24 percent of prior tourists would not visit Atlantic County beach towns, which could be a loss of:

8,700-12,700 jobs or 175,000 -255,000 job years over the project life

$1.3 $1.9 billion in annual revenue or a net present value of $17.4 - $25.5 billion over the project life, and

$142 - $206 million in government tax loss revenue over the project life.

Comment Number: BOEM-2024-0008-0611-0034
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

It is obvious that 357 (157 from this project alone) 1048 ft. tall turbines as close as 8.4 miles from a long beach coastline will have a MAJOR visual impact, as is in fact reported in the Visual Impact section. That MAJOR visual impact will unquestionably mean a negative impact on recreation and tourism. This is by far the closest to the shore large project contemplated for the US - yet there is no detailed discussion of that visual impact on Recreation and Tourism. In fact, that seems to be a deliberate omission, since one of

the references cited in the COP (Parsons and Firestone 2018) to support certain of its claims, includes estimates of such negative impacts. But those negatives are not quantified in the COP.

Comment Number: BOEM-2024-0008-0611-0035
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

The Recreation and Tourism industry is vital to NJ's economy and to the shore communities that will be impacted by this project. A study by Tourism Economics (an Oxford Economics Company) that was done on behalf of Long Beach Township estimates that the single year impact on the 5 townships on Long Beach Island alone would be 825,000 fewer visitors, $450 million in reduced visitor spending, resulting in 5,339 fewer jobs, and $32.7 million in reduced state and local taxes. Adding the indirect and induced impacts (from their IMPLAN modeling) drives the total costs to Ocean County to $668.2 Million, 6729 fewer jobs, and $80.3 Million in reduced state and local taxes. That Tourism study only covered the towns on Long Beach Island. Other Ocean county towns such as Seaside Park and Seaside Heights would also be impacted. And there would also be a significant impact on shore towns in Atlantic County as well, such as Brigantine, Margate, Long Port, Atlantic City, and Ventnor.

Comment Number: BOEM-2024-0008-0646-0001
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

Against the installation of wind turbines off of the NJ shoreline which will have a negative impact on the NJ communities, shoreline ecosystem and overall NJ economy

---

Comment Number: BOEM-2024-0008-0653-0002
Commenter Type: Individual
Commenter: Michael Devlin

Comment Excerpt Text:

3. Consider and evaluate supply chain risks.
GE Vernova has stated in February 2024 at an investor conference that their focus for the future will be their 15.5 MW unit in lieu of other larger 18 MW units. BOEM's design envelop should consider the supply chain risks associated with products that will lie outside the primary focus of commercial developers. Commercially viable and profitable elements from major suppliers represent lower risk to BOEM projects. The lure of nascent technologies that purport that bigger is always better must be tempered with the reality of commercial viability.

Comment Number: BOEM-2024-0008-0659-0001
Commenter Type: Individual
Commenter: prefer not To disclose

Comment Excerpt Text:

We don't want these turbines in our town. We pay the outrages property taxes , we paid for our homes and paid for the view we worked hard to enjoy. We don't need government overreaching anymore than it does

and we're sick of the nonsense. You're going to destroy our town. Our tourism will be gone, our homes will be worthless and people will lose their livelihood over a giant windmill farm. Our governor can go find another way to line his pockets but we don't intend to stand here and have you take away our sealife, our money and our way of life and the kicker is the power is going to NYC. Take it somewhere else.

Comment Number: BOEM-2024-0008-0660-0004
Commenter Type: Individual
Commenter: Jaime Mirabella

Comment Excerpt Text:

Property value losses with corresponding implications for other property owners.

Vacation rental losses (55% of previous renters of oceanfront & ocean view properties indicated they would not return if turbines were visible, even if offered an incentive).

Comment Number: BOEM-2024-0008-0747-0001
Commenter Type: Individual
Commenter: Daneen Osten

Comment Excerpt Text:

Something to consider when evaluating this proposed project - since the government is obviously throwing a lot of money at this project, does all of the equipment have to be manufactured in the United States per the law? If not, it should be. I read somewhere that foreign countries like Mexico, China, and India produce turbine parts and export to the US. We need to be very careful with this due to quality, safety, and national security. BOEM should ask Atlantic Shores for detailed information before approval on where their parts will be manufactured. Vast majority should be from the US and none from our enemies. We should also insist that at least 75% of the jobs are given to US legal residents.

Comment Number: BOEM-2024-0008-0761-0012
Commenter Type: Individual
Commenter: John Deputato

Comment Excerpt Text:

The claim that this will create jobs absolutely pales in comparison to jobs lost.

What happens to our real estate values?

If you did the calculations, you would know that BOEM's irresponsible leasing is affecting billions of dollars of business revenue and real estate value.

Comment Number: BOEM-2024-0008-0761-0013
Commenter Type: Individual
Commenter: John Deputato

Comment Excerpt Text:

From SaveLBI survey data.

- 50% of prior renters would not rent again with turbines visible.

- 19% percent would not visit that beach town, in this case Beach Haven

Property Value Loss, $0.2-1.0 million for each ocean front and ocean view properties.

It you tally up the number of homes on the island that would be adversely affected that would equate to an extremely large sum of money.

Comment Number: BOEM-2024-0008-0761-0016
Commenter Type: Individual
Commenter: John Deputato

Comment Excerpt Text:

I'm curious if you know how the average electric bill will be affected once these turbines are operational.

If you have done studies, will you provide NJ residents with projections because Independent studies show electric bills increasing by 30%.

Comment Number: BOEM-2024-0008-0761-0009
Commenter Type: Individual
Commenter: John Deputato

Comment Excerpt Text:

Are you prepared for this island to lose its main source of income and put thousands of people and family-owned businesses out of work?

Comment Number: BOEM-2024-0008-0778-0002
Commenter Type: Individual
Commenter: Prof. Edgar Gunter

Comment Excerpt Text:

wind turbine farms are extremely expensive to develop and maintain. All short wind turbines have a reduced life of it most 10 to 20 years as compared to the new modern small modular nuclear reactors which are designed to last 60 years. The maintenance of these wind turbines is extremely expensive.

Comment Number: BOEM-2024-0008-0789-0003
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

Further, there is rampant evidence that these horrific structures do NOT lower energy costs of consumers, I don't think that can even be disputed now. Look to the UK.

Comment Number: BOEM-2024-0008-0799-0002
Commenter Type: Individual
Commenter: Darlene Gossett

Comment Excerpt Text:

The governor of this state is doubling down on his decision because he refuses to look at the facts and admit this is not worth the cost to taxpayers of this state which is already one of the most heavily taxed states.

Comment Number: BOEM-2024-0008-0808-0005
Commenter Type: Individual
Commenter: Dennis De Forest

Comment Excerpt Text:

Equity and profit distribution:Overseas developers stand to profit from these project's,while the benefits to our local communities remain uncertain.

Comment Number: BOEM-2024-0008-0837-0002
Commenter Type: Individual
Commenter: Chris Monahan

Comment Excerpt Text:

Offshore wind energy is notably more expensive to implement and maintain compared to traditional and other renewable energy sources. The high costs associated with constructing and operating offshore wind turbines would likely lead to increased energy costs for consumers. Moreover, the reliability of wind energy is inherently variable, dependent on wind availability, and may not provide consistent energy output required to meet the needs of our communities.

Comment Number: BOEM-2024-0008-0856-0001
Commenter Type: Individual
Commenter: Marianne Geer

Comment Excerpt Text:

There is only ONE chance to get it right. We all own the ocean. We as NJ citizens and American citizens did not get to vote on this industrialization of our ocean. It's our tax dollars. There will be sound disturbances to ALLmarine life. Destroying fisheries. You've noted that on a power poster to the NJ public. Pay the fisherman off while you destroy food sources and generational life jobs.
We are all dependent on our ocean. The costs of electricity will be the highest of all energy sources available. You know this.
Stop this wind factory ruin of of our beautiful Atlantic coastal environment. You will be the ones to destroy this for many many generations. I would not want that as my legacy. The horizon and safety of our ocean will be forever ruined by your money driven project that will cost all taxpayers more and more. shame on our govt and the agencies they pay to tell us it's all good. I asked many BOEM employees if they even lived in NJ. Nope not a one. They want to even try to destroy a protected environmental land owned by NJDEP - island beach state park and industrialize a sanctuary for birds , marine life , fishing, animals. Our govt should really visit all these areas and see what they are affecting.
I'm one voice. I'm An environmentalist that cares for all the Earth.
DON'T destroy our OCEAN!

Comment Number: BOEM-2024-0008-0859-0001
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

Please stop the drilling. Please Do not go forward with these turbines. These will not save We The people money. Our bills will be raised for the repair and maintenance of these turbine s which do not produce a lot of energy

Comment Number: BOEM-2024-0008-0922-0001
Commenter Type: Individual
Commenter: John Maxwell

Comment Excerpt Text:

The Jersey shore is known for tourism. The economic impact on rentals, restaurants, and small business owners will be devastating. People do not want to look at thousands of wind turbines on once pristine vacation beaches. Atlantic Shores OWN IMPACT STUDY confirms the impact up and down Long Beach Island. It is "rich" to boast that OSW will create jobs when you do not include the tens of thousands of jobs lost from impacts on decreased tourism and the decimation of the fishing industry!

Comment Number: BOEM-2024-0008-0928-0015
Commenter Type: State Government
Organization: NJDEP

Comment Excerpt Text:

On the topic of fisheries compensatory mitigation, the MRA acknowledges the evolution of the requirements for fisheries compensation over the last several approved offshore wind projects, which supports the sustainability of New Jersey's valuable commercial fisheries and the delicate economic conditions of many of our ports. However, engagement with the fishing industry and coastal communities has been inadequate. A higher level of economic analysis early in the environmental review process is essential so that compensation discussions are not rushed, and stakeholders can be effectively engaged. A detailed economic analysis in the EIS will allow stakeholders, including NOAA Fisheries, to be more effective in providing comments and recommendations.

Comment Number: BOEM-2024-0008-0948-0003
Commenter Type: Individual
Commenter: John Caruana

Comment Excerpt Text:

And of course there is the cost. By all accounts wind power costs 4 times as much as that produced by natural gas plants, and the costs keep escalating. And this is based on the exaggerated claims that the turbines will last 25 years while most accounts show them lasting as little as 5-10 years.

Comment Number: BOEM-2024-0008-0969-0011
Commenter Type: Local Government
Organization: Long Beach Township, NJ

Comment Excerpt Text:

ECONOMIC IMPACTS
- Cumulative analysis of impacts to coastal housing and rental prices
- Cumulative analysis of impacts to recreation and tourism
- Cumulative analysis of impacts to commercial fishing and related industries
- Cumulative analysis of impacts to ocean traffic, navigability, and safety
- Cumulative analysis of impacts for residential, commercial, and industrial ratepayers

Comment Number: BOEM-2024-0008-0969-0012
Commenter Type: Local Government
Organization: Long Beach Township, NJ

Comment Excerpt Text:

SOCIAL IMPACTS
- Cumulative visual analysis from all historic properties and popular key vantage points
- Cumulative analysis of changes to ocean, seascape, landscape character units' character, and effects on viewer experience by the wind farm, vessel traffic, onshore landing sites, onshore export cable routes, onshore substations, converter stations or both, and electrical connections with the power grid
- Cumulative impact analysis on environmental justice communities, including effects on housing prices, loss of employment due to business disruptions, and hindrances to subsistence fishing
- Cumulative impacts on local health issues arising from air quality degradation near ports and waterways associated with offshore wind vessel traffic

Comment Number: BOEM-2024-0008-0970-0010
Commenter Type: Individual
Commenter: denise boccia

Comment Excerpt Text:

Demographics of Landfall ECC for Atlantic Shores Notice of Intent 0549:
Fresh Kills and Asbury Park are part of the onshore landfall Northern ECC. The Fresh Kills site in its natural state was primarily tidal creeks and coastal marsh. By 1955, Fresh Kills was the largest landfill in the world, serving as the principal landfill for household garbage collected in New York City, and closed the garbage dump in 2001. Today, Fresh Kills is a heavily industrial area. Asbury Park a historic shore town, you'll find a revitalized boardwalk that's better than ever. It is also part of the New York metropolitan area.

Comment Number: BOEM-2024-0008-0984-0002
Commenter Type: Individual
Commenter: Virginia Renehan

Comment Excerpt Text:

REE's are a costly extraction and polluting refining process.

Comment Number: BOEM-2024-0008-0987-0002
Commenter Type: Individual
Commenter: Paul Beisel

Comment Excerpt Text:

Who is financial responsible for the removal of wind turbines when they are past their lifetime? Will the clean up / removal be at tax payer expense?

Comment Number: BOEM-2024-0008-1003-0001
Commenter Type: Individual
Commenter: Margaret Bagley

Comment Excerpt Text:

Furthermore, the economic viability of offshore wind projects raises questions about their feasibility. The initial investment and ongoing maintenance costs associated with offshore wind farms are substantial, often leading to increased energy prices for consumers. In an era where affordability and accessibility of energy are paramount concerns, we must scrutinize whether offshore wind turbines truly offer a cost-effective solution.

Comment Number: BOEM-2024-0008-1010-0021
Commenter Type: Local Government
Organization: Cape May County, NJ

Comment Excerpt Text:

Economic Impacts

Cape May County's tourism industry demonstrated remarkable growth and resilience in 2022 with total direct tourism expenditures reaching an impressive $7.4 billion, representing an 11.9% increase or $787 million more than the previous year.

Based on the numbers above and Orsted's citation of a 15% decline in tourism in its own Tourism Fact Sheet for Ocean Wind 1, the County could face losses of up to $1.11 billion annually in total visitor spending, effectively erasing 6 years of direct tourism growth. The County's current tourism data suggests a 15% decline in tourism would result in the loss of 1.7 million annual visitors and consequently a loss in nearly 6,000 tourism-supported jobs. These projections are based solely off of one project, rather than the cumulative impacts once all projects are constructed.

Comment Number: BOEM-2024-0008-1021-0003
Commenter Type: Industry
Organization: EDF Renewables North America

Comment Excerpt Text:

The Project will also provide numerous environmental, health, community, and economic benefits, such as the creation of substantial new employment opportunities, including within disadvantaged communities. In accordance with the New Jersey Offshore Wind Economic Development Act (OWEDA), the State of New Jersey will be awarding Offshore Wind Renewable Energy Certificate (OREC) allowances to offshore wind energy projects through a competitive solicitation process every two years through 2026. Similarly, the New York State Energy and Research Development Authority (NYSERDA) is supporting the development of 9,000 megawatts (MW) of offshore wind energy by 2030. The Project is

being developed to possibly support one or both of the above-referenced solicitations.

Comment Number: BOEM-2024-0008-1021-0004
Commenter Type: Industry
Organization: EDF Renewables North America

Comment Excerpt Text:

Create approximately 27,000 full time equivalent (FTE) direct jobs, 13,000 FTE indirect jobs, and over 23,000 FTE induced jobs, for a total of more than 63,000 FTE jobs throughout the Project lifecycle.

Comment Number: BOEM-2024-0008-1021-0005
Commenter Type: Industry
Organization: EDF Renewables North America

Comment Excerpt Text:

Use local supply chains, increase revenues collected by Federal, State, and local governments, and contribute to the establishment of facilities and development of ports that will be instrumental in attracting and supplying future U.S. offshore wind developments to New Jersey and New York.

Comment Number: BOEM-2024-0008-1025-0002
Commenter Type: Individual
Commenter: Gilbert Foulon

Comment Excerpt Text:

there needs to be full disclosure on the costs of the energy that will be supplied by these wind farms along with realistic production numbers. What percent of rated output will they actually produce? The Atlantic City Wind Farm is rated to produce 7.5 megawatts, over the past 20 years, how much power have they actually produced?

Comment Number: BOEM-2024-0008-1028-0010
Commenter Type: Advocacy Group
Organization: BlueGreen Alliance

Comment Excerpt Text:

The EIS should include a discussion of how PLAs and Community Workforce Agreements (CWAs) will help ensure job quality and community benefits in the region. The EIS should also include the status of PLAs or CWAs associated with the project. A PLA is an instrument to predict and control project timelines and labor costs. A PLA establishes the terms and conditions of employment of workers on specific construction projects, including wages, hours, working conditions, and dispute resolution methods. These agreements can be utilized at the state and local level to ensure high-road labor standards and timely project completion. PLAs promote safe, quality, cost-effective project delivery by providing project owners with unique access to the safest, most productive, best-trained skilled craft labor available in any given market. They can also help to ensure equitable access to jobs by including diversity, equity, and inclusion and local hire provisions. CWAs can go a step further on diversity, equity and inclusion and are negotiated with both unions and community partners. According to the AFL-CIO, CWAs "go well beyond the traditional experience and use of PLAs to explicitly address the legitimate needs and interests of urban communities that have historically been excluded from the benefits of economic development."

CWAs frequently include local hire provisions, targeted hire of low-income or disadvantaged workers, and the creation of pre-apprenticeship pathways.

Comment Number: BOEM-2024-0008-1028-0011
Commenter Type: Advocacy Group
Organization: BlueGreen Alliance

Comment Excerpt Text:

Registered apprenticeship utilization should also be documented including the types of apprenticeshipsto ensure that they are union programs or DOL-certifiedand the ratio of apprentices to journeymen in each program.

Comment Number: BOEM-2024-0008-1028-0012
Commenter Type: Advocacy Group
Organization: BlueGreen Alliance

Comment Excerpt Text:

BOEM should include an analysis of existing or potential developer strategies in the state or region for investing in workforce training programs to support offshore wind development and include detailed information regarding training in the EIS.

Comment Number: BOEM-2024-0008-1028-0013
Commenter Type: Advocacy Group
Organization: BlueGreen Alliance

Comment Excerpt Text:

Lessees should invest in training programs that are portable; accredited; have stackable credentials; include safety training standards and disaster response measures; and are industry recognized

---

Comment Number: BOEM-2024-0008-1028-0028
Commenter Type: Advocacy Group
Organization: BlueGreen Alliance

Comment Excerpt Text:

Moreover, ensuring developers negotiate a PLA supports BOEM's proprietary interest in ensuring orderly and efficient operations. President Biden's Executive Order 14063, Use of Project Labor Agreements for Federal Construction Projects, issued February 4, 2022 underscores the benefits of utilizing PLAs for large-scale construction projects.

"Project labor agreementsprovide structure and stability to large-scale construction projects[and] avoid labor-related disruptions by using dispute-resolution processes to resolve worksite disputes and by prohibiting work stoppages, including strikes and lockouts. They secure the commitment of all stakeholders on a construction site that the Project will proceed efficiently without unnecessary interruptions."[Footnote xxvi: White House, Executive Order on Use of Project Labor Agreements for Federal Construction Projects, Feb. 4, 2022. https://www.whitehouse.gov/briefing-room/presidential-actions/2022/02/04/executive-order-on-use-of-project-labor- agreements-for-federal-construction-projects/]

PLAs have been demonstrated to reduce project costs for developers, save public funds in the long run, and produce increased economic benefits for the local community.

Comment Number: BOEM-2024-0008-1028-0003
Commenter Type: Advocacy Group
Organization: BlueGreen Alliance

Comment Excerpt Text:

We appreciate BOEM including an analysis of socioeconomic benefits in the EIS. As part of the NEPA process, BOEM is required to review environmental, social, and economic data related to the proposed project. In NEPA, Congress declared: "It is the continuing policy of the Federal Government...to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of Americans."

To create these conditions, it is imperative that BOEM plays a role in ensuring that the positive impacts of offshore wind projects are maximized and delivered equitably while using the best available science and data to establish measures to avoid, minimize, mitigate, and monitor environmental and wildlife impacts as well as their social implications. This will require that all offshore wind lease contracts and permitting activities ensure the application of high-road employment practices, community benefits agreements (CBAs), best management practices, and other means to ensure that projects are developed in an environmentally responsible manner and that benefits are maximized and equitable distributed.

Comment Number: BOEM-2024-0008-1028-0004
Commenter Type: Advocacy Group
Organization: BlueGreen Alliance

Comment Excerpt Text:

The EIS should analyze and provide information related to potential job creationincluding direct, indirect, and induced jobsfrom development in the lease areas. Furthermore, BOEM should analyze not only anticipated job creation, but the potential job quality impacts and benefits associated with this development.

Comment Number: BOEM-2024-0008-1028-0005
Commenter Type: Advocacy Group
Organization: BlueGreen Alliance

Comment Excerpt Text:

The U.S. Department of Labor (DOL)'s Good Jobs Initiative highlights equity and job quality principles and metrics that should be strongly considered by BOEM for use in the EIS. The equity and job quality principles include proactively addressing racial equity; reducing barriers to opportunity; supporting the creation of good-paying jobs with the free and fair choice to join a union; providing opportunities for all workersincluding underrepresented workersto be trained and placed in good-paying jobs; utilization of project labor agreements (PLAs) and/or local hire provisions, training and placement programs for underrepresented workers; and adopting an equity and inclusion program/plan focused on procurement, material sourcing, construction, inspection and hiring.[Footnote ii: U.S. Department of Labor (DOL), Previous Bipartisan Infrastructure Law (BIL) grants with focus on equity and job quality. https://www.dol.gov/general/good-jobs/making-good-jobs-through-federal-investments] These are great examples of metrics related to equity and job quality and should be considered for evaluating the job

creation benefits of offshore wind development and should inform future BOEM review of project-specific construction and operations plans.

Comment Number: BOEM-2024-0008-1028-0006
Commenter Type: Advocacy Group
Organization: BlueGreen Alliance

Comment Excerpt Text:

The EIS should analyze the potential for the project to source domestically manufactured components. BOEM should specify job categories as well as associated potential direct, indirect, and induced jobs; gross state product; and anticipated personal income anticipated from the development. The analysis should also include an assessment of education and certifications necessary to access each job category; the training, average wages, hours, career advancement, physical demands, and safety information; as well as any commitments developers have made or secured from suppliers to ensure workers have the free and fair choice to join a union, such as through a union neutrality agreement. This information is essential for the U.S. workforce to have equitable access to employment opportunities.

Comment Number: BOEM-2024-0008-1028-0007
Commenter Type: Advocacy Group
Organization: BlueGreen Alliance

Comment Excerpt Text:

The EIS should also include information about the material quality, standards, and certifications needed to secure a supplier contract with an offshore wind developer in the region. This information is critical for U.S. companies to access opportunities, especially minority, women, and veteran owned businesses. Finally, the EIS should contain information about the offshore wind energy components that will be manufactured outside the United States, in order to understand the full potential of employment benefits from a mature domestic offshore wind supply chain.

Comment Number: BOEM-2024-0008-1028-0008
Commenter Type: Advocacy Group
Organization: BlueGreen Alliance

Comment Excerpt Text:

Similarly, for O&M job impacts, the assessment should specify O&M job categories, anticipated job numbers in each category, and associated potential direct, indirect, and induced jobs; gross state product; and anticipated personal income. It should also include an assessment of education and certifications necessary to access those jobs; training, average wages, career advancement, hours, physical demands, and safety information; as well as any commitments developers have made or secured from suppliers to ensure workers have the free and fair choice to join a union, such as through a union neutrality agreement. The EIS should also indicate the number of jobs that, if any, require specialized experience that would prohibit workers in the United States from accessing those jobs, and the specific experience and training that is required. When it comes to training, the assessment should specify whether workers will need to go overseas to receive training, and the duration of that training. The EIS should specify jobs categories related to the operation and maintenance of every aspect of offshore wind development, including the turbines, cables, and onshore and offshore substations.

Comment Number: BOEM-2024-0008-1028-0009
Commenter Type: Advocacy Group
Organization: BlueGreen Alliance

Comment Excerpt Text:

This EIS should assess potential construction jobs associated with development in the lease areas, including any construction jobs anticipated to prepare ports for assembly, preparation of cable routes and interconnections, and the construction or site preparation of any manufacturing facilities. Consistent with the previous two categories, BOEM should specify job categories, job numbers in each category, and potential direct, indirect, and induced jobs; gross state product; and anticipated personal income. The EIS should also include an assessment of education and certifications necessary to access each job category and training, average wages, hours, career advancement, physical demands, and safety information. If any construction jobs require specialized experience that prohibit workers in the United States from accessing these jobs, that should also be detailed, including the number of jobs, as well as the training and experience required. The EIS should also specify whether workers will need to go overseas to receive training, and the duration of that training.

Comment Number: BOEM-2024-0008-1029-0014
Commenter Type: Individual
Commenter: Douglas Crawford

Comment Excerpt Text:

I submit it is NOT the best "renewable" choice. It is now becoming clear that the investment required to serve a given number of homes with offshore wind is tremendously overpriced. It can be demonstrated that for small fraction of the offshore wind investment those homes would be better served by their own solar energy system, panels and a storage battery. Easily 1/3 the cost or less. These would be supplied by a program to install them by a fully funded state program. If the public comes to understand this, they will reject having offshore wind put on their backs and will insist that NJ comes up with a plan that puts the same investment into installing a solar system on every suitable home instead.

Comment Number: BOEM-2024-0008-1030-0001
Commenter Type: Individual
Commenter: karen eachus

Comment Excerpt Text:

When considering the efficient and economically beneficial distribution of electricity from offshore wind projects, it is record that the NJ Board of Public Utilities has arbitrarily lifted the rate caps that apply to traditional electric distribution entities, because wind generated offshore electric is inherently inefficient.

Comment Number: BOEM-2024-0008-1043-0012
Commenter Type: Local Government
Organization: Borough of Sea Girt, NJ Planning Board

Comment Excerpt Text:

A concern regarding the seemingly unknown financial viability of the Developer and the project

Comment Number: BOEM-2024-0008-1043-0003
Commenter Type: Local Government
Organization: Borough of Sea Girt, NJ Planning Board

Comment Excerpt Text:

A concern regarding the potentially adverse economic
impact the proposed development can have on the Borough's Summer Season

Comment Number: BOEM-2024-0008-1043-0005
Commenter Type: Local Government
Organization: Borough of Sea Girt, NJ Planning Board

Comment Excerpt Text:

A concern that the proposed development will solely promote the private economic interests of the Developer, at the expense of the Borough of Sea Girt and other waterfront communities

Comment Number: BOEM-2024-0008-1064-0002
Commenter Type: Advocacy Group
Organization: New Jersey Wind Works Coalition

Comment Excerpt Text:

Developing New Jersey's offshore wind industry will bring a myriad of economic benefits. The ASOW North project will create hundreds of good-paying, union jobs in the manufacturing, construction, operation, and continued maintenance of wind turbines. Throughout the duration of its project lifetime, ASOW North is projected to contribute a total of $937.9 million in labor income and $1.3 billion in value added. The offshore wind industry as a whole will strengthen the Jersey Shore's booming tourism economy by aesthetically modernizing shoreline communities and opening up doors to the ecotourism industry, indirectly benefiting small local businesses along the coast.

Comment Number: BOEM-2024-0008-1083-0009
Commenter Type: Local Government
Organization: Borough of Sea Girt, New Jersey

Comment Excerpt Text:

The proposed wind farms will ignore the rallying mantra of the Environmental Protection Agency dating back to its formation that a project must be Cost-effective, Environmentally Sound, and Implementable! One does not have to look hard to see massive subsidies to justify the remaining immense costs.

Comment Number: BOEM-2024-0008-1094-0012
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

Proposed action is tantamount to a taking of property because the value of the ocean is usurped for the enrichment of the offshore wind developers.

Comment Number: BOEM-2024-0008-1096-0011
Commenter Type: Individual
Commenter: Teresa Boyle-Vellucci

Comment Excerpt Text:

The wind farm as proposed is being pushed upon our community unfairly.
We would also add that the LBI already utilizes alternative energies. For example, many homes and business use solar power.

Comment Number: BOEM-2024-0008-1096-0007
Commenter Type: Individual
Commenter: Teresa Boyle-Vellucci

Comment Excerpt Text:

And, to add insult to injury, we understand that the lease for the rights to construct and install the wind farm was a mere one million dollars. And further, there is NO commitment that New Jersey residents will even be the beneficiaries of the energy generated by the wind farms, which is entirely unacceptable.

Comment Number: BOEM-2024-0008-1096-0008
Commenter Type: Individual
Commenter: Teresa Boyle-Vellucci

Comment Excerpt Text:

Furthermore, during the explanation of the basis for the location of the windfarms, the BOEM and all related government agencies and, of course, Atlantic Shores, have failed to address one of the realities in locating the farm so near to our shores, the profit margin for Atlantic Shores in investing in this project. It will cost more for the electric line supply installation to be out farther in the ocean. This is the true basis of the location of the wind mills so close to our shores, not the Department of Defense needs, transportation lines or otherwise.

Comment Number: BOEM-2024-0008-1101-0002
Commenter Type: Individual
Commenter: Eileen Barker

Comment Excerpt Text:

Instead of delivering economic growth, these turbine projects will be destroying the natural environment and the ecosystems that support our economy in the recreational and commercial boating industries. According to the National Marine Manufacturing Association new regulations to limit the speed of the boats alone will put 810,000 America jobs and nearly $230 billion in economic contributions in jeopardy.

Comment Number: BOEM-2024-0008-1104-0004
Commenter Type: Individual
Commenter: Athena Clark

Comment Excerpt Text:

and the subsequent decommissioning costs.

Comment Number: BOEM-2024-0008-1109-0003
Commenter Type: Advocacy Group
Commenter: Marlene Asselta
Organization: Southern New Jersey

Comment Excerpt Text:

These massive projects are multimodal in nature and will foster job creation and further strengthen South Jersey's clean energy economy for years to come.

Comment Number: BOEM-2024-0008-1109-0006
Commenter Type: Advocacy Group
Commenter: Marlene Asselta
Organization: Southern New Jersey

Comment Excerpt Text:

As the largest proposed offshore wind project in the state of New Jersey, Atlantic Shores North will contribute approximately $18 million per-year in guaranteed local economic benefits, and provide millions of dollars toward innovation, workforce development and academic institutions in New Jersey. Project 3 is expected to directly create more than 14,378 full-time equivalent (FTE) jobs, indirectly create more than 11,710 FTE jobs, and induce over 14,334 FTE jobs throughout their lifecycles.

Comment Number: BOEM-2024-0008-1112-0003
Commenter Type: Local Government
Organization: Sea Girt New Jersey

Comment Excerpt Text:

A concern regarding the potentially adverse economic impact the proposed development can have on the Borough's Summer Season;

Comment Number: BOEM-2024-0008-1112-0005
Commenter Type: Local Government
Organization: Sea Girt New Jersey

Comment Excerpt Text:

A concern that the proposed development will solely promote the private economic interests of the Developer, at the expense of the Borough of Sea Girt and other waterfront communities;

Comment Number: BOEM-2024-0008-1117-0003
Commenter Type: Individual
Commenter: Penny Applegate

Comment Excerpt Text:

The loss of property value due to the negative impacts

4. Selling the power to other than the residents whose way of lif is impacted.

Comment Number: BOEM-2024-0008-1122-0006
Commenter Type: Individual
Commenter: Anonymous

Comment Excerpt Text:

HOME RULE AND MUNICIPAL RIGHTS TAKEN FROM NEW JERSEY CITIZENS

- Increased (15-25%) electric utility rates for consumers

- Taxpayer-funded continuous repairs

ECONOMIC IMPACTS

- Plummeting beach tourism revenue, boating, fishing and property values DESTROYING the commercial fishing industry

- The commercial fishing industry provides approximately 35% of our food supply

Comment Number: BOEM-2024-0008-1124-0003
Commenter Type: Advocacy Group
Commenter: Anjuli Ramos
Organization: Sierra Club

Comment Excerpt Text:

Importantly, OSW is critically important for building a more sustainable New Jersey for our neighbors and generations to come. OSW.can power more than our energy sector, it can engine our state's economy too. Atlantic Shores North is expected to directly create more than 14,378 full time equivalent (FTE) jobs, indirectly create more than 11,700 FTE jobs, and induce over 14,300 FTE jobs throughout their lifecycles, and contribute approximately $18 million/year in guaranteed local economic benefits. These jobs include manufacturing, transportation, construction, engineering, and operations and maintenance positions. These are local, green, family-sustaining jobs that will carry our communities into the future. Additionally, Atlantic Shores North will provide millions of dollars toward innovation, workforce development and academic institutions in New Jersey.

Comment Number: BOEM-2024-0008-1130-0003
Commenter Type: Individual
Commenter: Dave Mitchell

Comment Excerpt Text:

In the end, this comes down to the company that's been insured, the tax payers of New Jersey to pay them back if it fails to pay the money for it, on top of that, the companies and stockholders that can buy these who are foreign companies besides this one being partially owned by Shell is also a French company, that

has ownership in the middle east, we are giving up our ability for our environment and our enjoyment to allow the company to earn money that's not going to be in the United States and on top of that, there is the concern about who maintains the lucrative service contract because this isn't going to help any small business, women owned business, ADA business, this going to have to be a massive company that does this and they are going to be able to earn this income from this on service contracts for years and years unlike an actual project that they -- that was done on land that a small business may be able to throw their hat into, into a contract and get that contract and better themselves and actually do a job so they can pay folks here, this is not going to benefit anybody in New Jersey, it's going to benefit foreign investors, going to benefit the stockholders of companies and ultimately it doesn't sound like it's even profitable, will make a difference in the environment. There is more risk than there is actually benefit.

Comment Number: BOEM-2024-0008-1131-0002
Commenter Type: Advocacy Group
Commenter: Carl Van Warmerdam
Organization: Deep Sea Defenders

Comment Excerpt Text:

So these projects are economically unfeasible. They are only brought about through mandates, government mandates and massive amounts of subsidies. They cannot stand alone by their own. So non nondispatchable energy is -- the reason why they are so close in is because it takes more materials, and it loses power the further out it is so they want these, most power stations are close to where the power need is, these will be way out but not far enough to mitigate the problems to local communities in terms of the view and employment jobs with the recreation, fishing, so the jobs they provide will not help to prevent those jobs that will be lost, so those lost jobs are never accounted for.

Comment Number: BOEM-2024-0008-1133-0001
Commenter Type: Individual
Commenter: Diane Snelson

Comment Excerpt Text:

As a New Jersey tax payer with a house on LBI for over 25 years, I object to the industrialization of our shores with this project approved by executive orders in 2020 during the height of Covid when none of us were any kind of stakeholders, we had no stakeholder engagement, none of us on the island. We knew nothing about this.

The Jersey Shore is a cherished gem of the state and it's really, the proposed projects really threaten to devastate our pristine coast line, endanger our marine life, dismantle the fishing industry, disrupt the tourism that sustains local businesses and peoples' livelihoods. These projects are heavily subsidized by the government and the tax payers will ultimately be held accountable for the resulting increase in cost and the soaring electric bills which all the data shows is going to increase cumulatively over time.

Comment Number: BOEM-2024-0008-1136-0002
Commenter Type: Individual
Commenter: Michael Casey

Comment Excerpt Text:

If you are going to say there is jobs increased, you need to factor in the jobs lost.

Comment Number: BOEM-2024-0008-1138-0003
Commenter Type: Individual
Commenter: Kathleen Harper

Comment Excerpt Text:

We are looking at millions of acres and we are looking at our utility bills to double or triple. It is proven, this has happened all over the word, Europe, Germany, France, England, Australia, all over the world that the electricity bills do not go down, they will usually double or triple. We are going to allow foreign companies to come in and control our electricity. What is up with this? America should control its own electric output, nobody else.

Comment Number: BOEM-2024-0008-1140-0002
Commenter Type: Individual
Commenter: John Magliochetti

Comment Excerpt Text:

First, all organizations participating in these meetings need to disclose any economic ties, donations and funding provided by Atlantic Shores or other entities looking into industrializing our oceans.

Comment Number: BOEM-2024-0008-1140-0004
Commenter Type: Individual
Commenter: John Magliochetti

Comment Excerpt Text:

Developers have requested and they have been granted additional tax subsidies before any turbine has been built, meaning the cost and economic benefits that are already over inflated leads to more questions on how much more the residents of New Jersey will need to pay.

Comment Number: BOEM-2024-0008-1154-0001
Commenter Type: Individual
Commenter: Robert Zuczek

Comment Excerpt Text:

this is a calamity for taxpayers. Corporate welfare of the worst kind. We are on the hook to write blank checks to mostly out of state and foreign wind investors all funded by you the taxpayers. It cost us over $120 billion last year alone. Money for schools, for teachers, for kids, all gone.

Comment Number: BOEM-2024-0008-1154-0003
Commenter Type: Individual
Commenter: Robert Zuczek

Comment Excerpt Text:

And furthermore, the New Jersey Rate Council who are the watchdogs for the public with rates so that rate payers are not gouged, they are against these projects because they know how expensive these rates will be once the projects are built.

Comment Number: BOEM-2024-0008-1156-0001
Commenter Type: Individual
Commenter: Roseanne Serowatka

Comment Excerpt Text:

Many times they look at the turbines that are already in existence. Block Island, they throw are that out but that's five turbines and earlier in this session, the groups said they looked at the projects that were in Rochdale in the United Kingdom as your study base, and I looked at that also and that has 26 turbines. But it also was having some problems.

And I am going to read just a little bit from information that was found about this group that you are using as your study base. Even as capacity and investment steadily grew, project delays, regular uncertainty around the grid connections along with financial and supply chain constraints continue to hamper faster employment. They had a double economic blow that has compounded cost, cost of building, installing, materials, borrowing money and additionally developers have seen these spiraling cost that have forced them to render the project no longer profitable.

Not to go on, but this is on the site I am looking on in the UK, it goes onto talk about fractured turbines that had to be towed, talk about crew vessels that need to be serviced and the list goes on about the hazards that are involved with wind turbines.

Comment Number: BOEM-2024-0008-1157-0001
Commenter Type: Individual
Commenter: John Deputato

Comment Excerpt Text:

I am very concerned about the small businesses on the island and the degree to which this project seems to be being pushed through despite all the opposition. I am concerned about climate change but I don't know why this project is being pushed through at the rate at which it's being pushed through.

The New Jersey legislature and Governor Murphy removed any local towns from having a say in how this is being approached. I don't know if BOEM or Atlantic Shores has done enough survey work to look at the effect of tourism, but if you look at some survey work that was done by Orsted, survey work that's been done by Save Long Beach Island, you can see that tourism is down in numbers that I believe are in the high double digits in the 15 to 25 percent. If these numbers actually are hit, this island will crash, the businesses, the small businesses that are on the island would be highly affected.

I know that my home value would definitely be affected as well as all the other rental properties on the island. This is an island that depends high on tourism and rental. So I am very concerned about that.

Comment Number: BOEM-2024-0008-1159-0005
Commenter Type: Advocacy Group
Commenter: Adam Nolan
Organization: New Jersey League of Conservation Voters

Comment Excerpt Text:

Moreover the economic implications are equally compelling throughout the project lifetime. This stands to inject vitality into the New Jersey economy contributing a total of $937.9 million dollars in labor income and $1.3 billion in value added.

Offshore wind has the enormous potential for job creation, economic growth and enhanced prosperity for

our communities.

Comment Number: BOEM-2024-0008-1163-0002
Commenter Type: Individual
Commenter: Elaine Furda

Comment Excerpt Text:

The placement of these turbines will affect, firstly, the local economy, as small businesses will suffer due to the decline in tourism.

Comment Number: BOEM-2024-0008-1163-0004
Commenter Type: Individual
Commenter: Elaine Furda

Comment Excerpt Text:

The turbines will also affect the property values of the homes on Long Beach Island. It will also affect the rentals, as no one will want to rent a vacation property and sit on the beach and have a view of the turbines.

Comment Number: BOEM-2024-0008-1164-0003
Commenter Type: Individual
Commenter: Carolyn Rush

Comment Excerpt Text:

I look forward to the jobs that will be coming to the State of New Jersey,

Comment Number: BOEM-2024-0008-1165-0003
Commenter Type: Individual
Commenter: Chris Placitella

Comment Excerpt Text:

A report done by Tourism Economics that just came out last month said, for Ocean County alone, for Atlantic Shores South alone, not the combined result, there will be an $837 million economic loss per year, and more than 6,700 jobs. That's without looking at the combined effects.

And to add insult to injury, a good percentage of this power is going to New York. So, while the New Jersey Coastline will be marred forever and taken from our children, we don't even get the benefit of all of the power, nor the savings.

Comment Number: BOEM-2024-0008-1166-0003
Commenter Type: Individual
Commenter: Nancy Donovan

Comment Excerpt Text:

Their businesses are going to fail. The economy of all the New Jersey Shore towns are going to suffer terribly because of it.

Comment Number: BOEM-2024-0008-1170-0001
Commenter Type: Individual
Commenter: Craig Kierce

Comment Excerpt Text:

I don't see how we can afford to increase our energy bills by using so called renewables that are subsidized on such great scale.

We have for example, if you look at Great Britain and Germany, other countries that have renewables, Great Britain is their bills have gone up 83 percent, they are not going down since they installed so many wind turbines and solar panels, they have gone up dramatically, especially paying for such incredibly expensive structures. Germany used to be the envy of Europe for their heavy industry and now it's tanking because they've been forced to rely on renewables. That's not a plus.

Comment Number: BOEM-2024-0008-1179-0001
Commenter Type: Advocacy Group
Commenter: Reverend Ronald Tubb
Organization: Green Faith

Comment Excerpt Text:

We want to make sure that the so called jobs that they will be trained and they will be, because if most of them will be Union jobs, we want to make sure that the low and moderate minority community will be accepted into the Union, not only accepted into the Union but will be trained for these jobs. We want to make sure they will be, if they have to be requalified, recertified or reeducated, we want to make sure that the project works with community development corporations that will go into the organized community and train and teach the low and moderate communities to qualify for these jobs.

We need a commitment, a commitment that the Unions will be brought to the table and that there will be a percentage that they have to hire from the local and low to moderate and minority community. We want to make sure that the jobs, when they come to the community, they say we didn't find anybody qualified. Yes they are qualified, they will be requalified.

We want to make sure we work with this project in order to qualify the low and moderate -- low and moderate people in the community to qualify for these jobs and make sure they sit down with all the Unions that are involved and they will be retrained and they will be recertified and that they will work with community development corporations to work with these people. I now yield my time.

Comment Number: BOEM-2024-0008-1182-0004
Commenter Type: Individual
Commenter: Lisa Bonanno

Comment Excerpt Text:

So between being basically held hostage to whatever is happening in other countries, because all the oil gets put on one market. It's not like we can only use American oil. Everything goes in one pool and then a conglomerate sets the pricing. It's not like we can just use our own, it just doesn't work that way.

Comment Number: BOEM-2024-0008-1183-0001
Commenter Type: Individual
Commenter: John Breitling

Comment Excerpt Text:

Long Beach Island doesn't have a boardwalk or casinos to attract tourists. Tourists come to LBI for its clean water and beautiful beaches. This has created an economy of businesses which support the tourists that are here to relax, swim and soak up the sunshine on the beach.

I am concerned the visible wind turbines will permanently devastate the tourist economy and property values on LBI. Atlantic Shores is installing the wind turbines that will be located in the ocean in an area between eight and 16 miles off LBI from Barnegat Light South to Holgate. I know this because I measured the distance on charts provided by Atlantic Shores.

Comment Number: BOEM-2024-0008-1186-0001
Commenter Type: Advocacy Group
Commenter: James Thompson
Organization: New Jersey League of Conservation Voters

Comment Excerpt Text:

Today I am here to emphasize support for the Atlantic Shores North project and the opportunities it would provide for cleaner air, positive impacts to our public health and the positive impact to our statewide economy and good paying family sustaining Union jobs. Any concerns raised by environmental organization dedicated to addressing climate changed are aimed at enhancing the overall quality of this crucial initiative for all of the projects. Notably, our offshore wind coalition New Jersey (inaudible) as I mentioned before, is dedicated to ensuring the responsibly and sustainable development of offshore wind here in the state of New Jersey. Offshore wind is a driving opportunity for our state. The creation of thousands of well-paying Union jobs.

Comment Number: BOEM-2024-0008-1189-0001
Commenter Type: Individual
Commenter: John Deitchman

Comment Excerpt Text:

Other purported benefits include economic contributions to local economy and thousands of new jobs, both are false premises. An example, the Atlantic Shores One project was said to deliver almost $2 billion in economic benefits and to create tens of thousands of job years, those assertions were grossly misleading. They were not freebies but must be paid for by the rate payers and tax payers. Nor do those numbers include reduced revenue, the job losses and tourism industry, fishing and shore communities and the broader New Jersey economy due to inflated electricity costs.

A study by Wide Strand Consulting pairs the Atlantic Shores One project rate subsidy at $3.6 billion, that rate subsidy alone exceeds the claimed economic benefits. To that rate subsidy Wide Strand adds cost for reductions in tourism and inflated cost of electricity, and it then pegs the total net cost to New Jersey, that costs in excess of benefits at $15 billion. At that level the cost to the state for each claimed job would be $368,000, worse yet taking into account the expected loss jobs and tourism and a general economy due to inflated electricity cost, it would actually be a net loss of almost 3,000 full-time jobs per year.

Comment Number: BOEM-2024-0008-1191-0002
Commenter Type: Advocacy Group
Commenter: Tiziana Bottino
Organization: Sierra Club

Comment Excerpt Text:

Offshore wind isn't just about energizing the power grid, it's a driving force behind New Jersey's economic growth. Predictions indicate that the typical wind farm off the coast of New Jersey could generate 4,300 jobs and inject $702,000,000 into the state's economy. These employment opportunities span various sectors such as manufacturing, transportation, construction, engineering and operation and maintenance, all contributing to a green and sustainable future. These jobs aren't just figures, they represent local families securing their livelihoods and propelling our communities towards a prosperous tomorrow.

Comment Number: BOEM-2024-0008-1203-0003
Commenter Type: Individual
Commenter: Robyn Federico

Comment Excerpt Text:

Some studies have said that the noise itself could cause like vertigo, sleep disturbances, nervousness, neurological conditions and I am asking you to please keep that all in mind because it's not worth all that you are saying for renewable energy to damage as much as that's going to be damaged with the fishermen, commercial fisherman, recreational people that rely on the seafood there on the island itself. I know people that run a clam chowder place, and he's going to be out of business.

Comment Number: BOEM-2024-0008-1203-0004
Commenter Type: Individual
Commenter: Robyn Federico

Comment Excerpt Text:

So according to going and creating jobs, I don't understand that part, because all the fisheries will be really hurt with the business and no one is going to want to look at the turbines so it will hurt the tourism as well.

Comment Number: BOEM-2024-0008-1205-0002
Commenter Type: Advocacy Group
Commenter: Bob Stern
Organization: Save Long Beach Island Incorporated

Comment Excerpt Text:

You do not consider the electric rate increases that occur from these projects, we have estimated you are talking about impacts on the order of 30 percent to electric bills and obviously that has a significant impact on the state's economy, jobs and so on, that needs to be considered.

A.3.10 Recreation and Tourism

Comment Number: BOEM-2024-0008-0004-0007
Commenter Type: Individual
Commenter: Noel Quinn

Comment Excerpt Text:

Offshore wind farms built within view of the coastline (up to 8.4 miles offshore) may also negatively affect tourism and coincidently, property values.

Comment Number: BOEM-2024-0008-0007-0002
Commenter Type: Individual
Commenter: Diane Snelson

Comment Excerpt Text:

The wind farm will industrialize our oceans. It will be the largest and closest wind farm in the world. This close-in, extreme location will ruin the pristine beaches that's a treasure of NJ. It will affect the tourism that fuels local businesses and people's livelihoods. No one in our community voted for this project. Gov. Murphy is forcing this upon us without our input.

Comment Number: BOEM-2024-0008-0068-0003
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

damaging secondary effects: reduced NJ shore tourism and summer visitors/renters with ripple effects on local businesses serving them due to high visibility of the windfarms from beaches

Comment Number: BOEM-2024-0008-0068-0007
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

-depressed real estate market as an industrialized Shore becomesless of a drawing point for purchasers (as well as renters)

Comment Number: BOEM-2024-0008-0069-0002
Commenter Type: Individual
Commenter: Virginia Murray

Comment Excerpt Text:

Additionally. there was no vote from the constituents of the state of New Jersey on this matter. Tourism is a big part of the NJ shore life, and these tourists support the local economy. Surveys have already concluded that NJ tourism would drop significantly if there are hundreds of turbines offshore.

Comment Number: BOEM-2024-0008-0485-0002
Commenter Type: Individual
Commenter: E. Robb

Comment Excerpt Text:

The real estate values and
rental income will plummet if the Atlantic Shores turbines are visible

Comment Number: BOEM-2024-0008-0488-0003
Commenter Type: Individual
Commenter: Colleen D'Abbene

Comment Excerpt Text:

Summer rentals and small business revenue will decline.

Comment Number: BOEM-2024-0008-0500-0001
Commenter Type: Individual
Commenter: Jennifer Convertino

Comment Excerpt Text:

This is absolute madness. Please stop this. You cannot destroy our oceans without serious consequences

Comment Number: BOEM-2024-0008-0502-0001
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

LBIs economy depends on tourists. By implemeting these wind farms, it will impact the tourism industry and revenue for all local businesses. People are coming for the beautiful beaches. This will impact businesses and then home values in a negative way.

Comment Number: BOEM-2024-0008-0510-0001
Commenter Type: Individual
Commenter: Karen Brooks

Comment Excerpt Text:

The lively hood of SO MANY families depend on the waters.. if you contaminate the oceans with these bad idea turbines the coastal communities will see a significant drop in tourism. It's pure greed what's happening and really needs to be stopped. NJ NC virgina Beach all heavily rely on tourism year round. Who wants to stay in a resort town and see these ugly turbines off shore. I like my views without them being obstructed

Comment Number: BOEM-2024-0008-0511-0001
Commenter Type: Individual
Commenter: Eleanor Hill

Comment Excerpt Text:

We all know that wind turbines are not efficient, are built and run with fossil fuel, will irrevocably damage the ocean environment, and kill those species that live in it

Comment Number: BOEM-2024-0008-0546-0003
Commenter Type: Individual
Commenter: S W

Comment Excerpt Text:

This will also decrease real estate values at every shore community they are installed at.

Comment Number: BOEM-2024-0008-0550-0002
Commenter Type: Individual
Commenter: AJ Conte

Comment Excerpt Text:

Installing the wind turbine generators and other infrastructure would substantially alter our natural seascape, possibly detracting from the coastline's aesthetic value and impacting tourism, which is vital to our local economy.

Comment Number: BOEM-2024-0008-0557-0005
Commenter Type: Individual
Commenter: Joseph Pallante

Comment Excerpt Text:

Tourism will decline, property values decline.

Comment Number: BOEM-2024-0008-0580-0002
Commenter Type: Individual
Commenter: Sharon Aloi

Comment Excerpt Text:

It will totally diminish tourism and living anywhere near the ocean. If enough of this happens it will destroy many states and make the area unlivable.

Comment Number: BOEM-2024-0008-0587-0002
Commenter Type: Individual
Commenter: Eryn Topper

Comment Excerpt Text:

This project in particular is planned closest to shore at only 8.4 miles, the locals and Jersey shore visitors will not only see but hear these monstrosities, what will that do to our economy?

Comment Number: BOEM-2024-0008-0604-0001
Commenter Type: Individual
Commenter: Chris Lorah

Comment Excerpt Text:

No wind farms in LBI. This is a beautiful beach that visitors and full timers come to and enjoy the beach and views.
I know so many people who come down for the summers who say they will go elsewhere if this wind farm is built. The shorelines in New Jersey is one of the most popular places for residence and visitors to go and enjoy with their families. Why ruin this gem

Please. Absolutely no reason to build here

Comment Number: BOEM-2024-0008-0612-0001
Commenter Type: Individual
Commenter: Jacqueline D'Eletto

Comment Excerpt Text:

Many people here, fishermen, business owners, restaurant workers, etc. support our families from the money we work for here, and many of us do work year round, some of us rarely even get to enjoy the beach especially in the Summer. But we live in a resort area, in an area that many people come to vacation, and many of us feed our families and clothe our children with the money that we make working in our jobs. If wind turbines are put up that people can easily see from the beach, I truly believe it will affect how many people will come here to vacation, to lay on the beach, and they will find other places to go. This will seriously affect our year round populations income and our abilities to provide for our families, which is very hard for many people here already, as the area we live, Long Beach Island is mainly a Summer destination for vacationers

Comment Number: BOEM-2024-0008-0656-0002
Commenter Type: Individual
Commenter: Janet Robinson

Comment Excerpt Text:

Installation of wind turbines will change the character and use of the ocean as a tourist destination; fewer tourists will come. The view and noise of the turbines will reduce instead of improve the mental and physical health of Shore visitors seeking relaxation and a break from their stressful daily lives. A thriving economy built around tourism will be destroyed by this industrial intrusion.

The Jersey Shore is a major tourist destination. Every summer on Long Beach Island, I see license plates from all over the US and Canada. Tourists generate major economic benefit to local businesses and landlords, which results in increased income and sales tax revenue. The proposed wind farms will only be 10 miles away and will be clearly visible from the beach, both day and night. Ruining the beach with these turbines will reduce tourism and property values. Owners who bought Shore homes because of the beach are already considering selling before the market drops. If the wind farms are built, many will leave. Do we want NJ known for its beautiful Shore or as a textbook example of over-industrialization and sabotage of a once beautiful natural habitat?

Comment Number: BOEM-2024-0008-0660-0003
Commenter Type: Individual
Commenter: Jaime Mirabella

Comment Excerpt Text:

Negative impact of NJ's Economy:
Losses in tourism revenue (estimated at $300 million per year) - leading to pressure on businesses and ultimately jobs

Comment Number: BOEM-2024-0008-0761-0010
Commenter Type: Individual
Commenter: John Deputato

Comment Excerpt Text:

NC State researchers in 2016 found that 80 percent of North Carolina beachgoers would either not return to a beach rental if wind turbines were visible or require an unreasonable discount for spoiled views.

Comment Number: BOEM-2024-0008-0800-0002
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

2. The project will also damage both the fishing industry and the tourist industry along the New Jersey shore. Many businesses in coastal towns rely on tourists during the warmer months to financially sustain themselves for the rest of the year. The businesses include restaurants,hotels,charter boats, amusement services as well as homeowners. Who will subsidize these businesses when tourists decide to vacation elsewhere?

Comment Number: BOEM-2024-0008-0805-0001
Commenter Type: Individual
Commenter: Christine Fritsch

Comment Excerpt Text:

I have been vacationing on LBI for over 50 years and was lucky enough to purchase a home Surf City in 2016. I rent the house for several weeks during the summer to pay the mortgage. I first became aware of the federal government's OSW lease areas less than 8 miles directly off LBI in the spring of 2020. I sat in on zoom call with local residents horrified to hear the scope and scale of the project. I have been following the process since that time; attending the informational meeting held in Manahawkin 6/21/23 and recently your virtual public meeting on Atlantic Shores North 4/3/24.

Comment Number: BOEM-2024-0008-0805-0004
Commenter Type: Individual
Commenter: Christine Fritsch

Comment Excerpt Text:

Hundreds of thousands of people come every summer to LBI to sit on the beach and enjoy the view. Tourism is the bread and butter of the New Jersey Coast. There is no amount of OSW jobs that would

replace the lost tourism revenue. I understand that wind farms operate successfully around the world; the key difference is that those OSW farms are far from the coastline. One of the biggest OSW is nearly 40 miles from the coast of England in the North Sea. The Jersey Shore is not the North Sea; to put the largest wind turbines in the world 8 miles from LBI is just absurd. There have been other communities in the US(Hamptons off of NY) and around the world(Italy) were OSW has been banned. Sighting that the visual disruption would be bad for business.

Comment Number: BOEM-2024-0008-0808-0002
Commenter Type: Individual
Commenter: Dennis De Forest

Comment Excerpt Text:

tourism and local economy: Our coastal towns heavily rely on tourism.Visitors come here for the natural beauty,tranquility and recreational activities.the presence of wind turbines could deter tourists and harm local businesses,leading to economic losses.

Comment Number: BOEM-2024-0008-0813-0006
Commenter Type: Individual
Commenter: Laurie Maxwell

Comment Excerpt Text:

The Jersey shore is known for tourism. The economic impact on rentals, restaurants, and small business owners will be devastating. People do not want to look at thousands of wind turbines on once pristine vacation beaches. Atlantic Shores OWN IMPACT STUDY confirms the impact up and down Long Beach Island. It is "rich" to boast that OSW will create jobs when you do not include the tens of thousands of jobs lost from impacts on decreased tourism and the decimation of the fishing industry!

Comment Number: BOEM-2024-0008-0833-0001
Commenter Type: Individual
Commenter: Gina Masessa

Comment Excerpt Text:

I strongly object to the turbines off of LBI. For 20 years I have owned in LBI and rent my house. People pay top dollar for our beautiful beaches. The tarnished landscape will no doubt hurt our economy and property values!

Comment Number: BOEM-2024-0008-0837-0003
Commenter Type: Individual
Commenter: Chris Monahan

Comment Excerpt Text:

The visual presence of turbines can significantly reduce the aesthetic value of ocean vistas, thereby potentially decreasing property values and deterring tourism, which many coastal communities heavily rely on.

Comment Number: BOEM-2024-0008-0914-0001
Commenter Type: Individual
Commenter: Bill Moller

Comment Excerpt Text:

I wanted to say that I feel this wind farm has been thrown on us with no representation from public officials. We saved to finally purchase our home in Surf City Long Beach Island since dreaming of this for 40 years. Now if this wind farm is built, it will ruin the reason so many of us have homes here. Not to mention how bad this is for the environment. we will see no benefit from this destroying our island also. I just see the tax revenue dropping from less people coming to vacation here in the summer and opting to go to beaches they do not have to look at windmills. I will be forced to sell our home and move someplace without this industrial look.

Comment Number: BOEM-2024-0008-0948-0004
Commenter Type: Individual
Commenter: John Caruana

Comment Excerpt Text:

And then lastly there are the aesthetics of these monstrous industrial machines. A few years back I was on vacation in the beautiful Thousand Islands region of New York. Beautiful, except for one island, I believe on the Canadian side, covered in wind turbines. Anyone who thinks these aren't a blight on the environment should go see what an industrial scale installation looks like. The Block Island turbines, small by comparison to what is being proposed, are clearly visible from 20 miles away on a clear day. Installing these turbines only 8.4 miles from the beach will create a dramatic change to the character of the ocean beaches.

Comment Number: BOEM-2024-0008-0962-0005
Commenter Type: Individual
Commenter: Barbara Sommer

Comment Excerpt Text:

What impact will that have on tourism and the local economies? The construction and maintenance of these turbines will disrupt local ecosystems and habitats for many years, impacting both wildlife and tourism.

Comment Number: BOEM-2024-0008-0985-0004
Commenter Type: Individual
Commenter: Tony Alexander

Comment Excerpt Text:

New Jersey tourist negative impact resulting in billions of lost revenue

Comment Number: BOEM-2024-0008-0989-0002
Commenter Type: Business/Trade Association
Organization: Vacation Rentals Jersey Shore LLC

Comment Excerpt Text:

There are a multitude of reasons these should not be built, that I am sure others will bring up. But I will limit my response to tourism. I bring to your attention two studies, one by North Carolina State University and one by the University of Delaware. These studies surveyed beach vacationers on whether they would return if the ocean had a view of wind turbines. These studies showed that up to 50% of families who rent at the shore would either not come back or require a HUGE discount to share their ocean with wind turbines. These studies were done several years ago, and they had turbines much smaller than the ones now being considered off NJ.

Comment Number: BOEM-2024-0008-0989-0003
Commenter Type: Business/Trade Association
Organization: Vacation Rentals Jersey Shore LLC

Comment Excerpt Text:

I am also the owner of Vacation Rentals Jersey Shore, a marketing company that advertises shore rentals in three markets at the shore, LBI, Ocean City, and Wildwood NJ. We have a database of over 100 thousand vacationer families who have rented at the shore over the last 6 years.

Last fall, we sent a simple one question survey to families who have rented on LBI over the last 6 years. We showed them one picture of the turbines from the AS1 simulations off the south part of LBI and asked them if they would come back and rent again if this was their view. A whopping 74% said they would not!

Comment Number: BOEM-2024-0008-0989-0004
Commenter Type: Business/Trade Association
Organization: Vacation Rentals Jersey Shore LLC

Comment Excerpt Text:

Tourism is one of the largest contributors to NJ's economy and The Shore, especially Ocean and Cape May Counties which contribute hundreds of millions to our economy and taxes to the state. I STRONGLY suggest you not approve any additional lease areas until a real study is done with regards to the effect these industrial wind farms will have on our shore tourism economy.

Comment Number: BOEM-2024-0008-0999-0001
Commenter Type: Individual
Commenter: Alissa Kanowitz

Comment Excerpt Text:

In addition to causing existential harm to whales, fishing and wildlife, it will devastate tourism and real estate values on Long Beach Island. In a study by NC state, 54% of renters said they would not return if turbines were visible -- and that was based on turbines half the size. I have seen estimates that home values will decrease by $200K-$1M. As a realtor, I can confidently say that these numbers are extremely understated. Property values on the island will drop by 40-50% since the pristine beaches are the ONLY reason why people buy on LBI and not the mainland.

Comment Number: BOEM-2024-0008-1008-0006
Commenter Type: Individual
Commenter: John Casagrande

Comment Excerpt Text:

Finally, the proposed offshore wind deployments can be seen from our beaches. No studies have captured the economic impact this may have on the tourism industry. No studies have been done on the impact a reduction in tourism, the drastic reduction of recreational and commercial fishing industries, and the massive increase in energy costs to rate payers will have on property values. There are also no studies being done to how this will impact other businesses.

Comment Number: BOEM-2024-0008-1082-0004
Commenter Type: Individual
Commenter: Denis Meyers

Comment Excerpt Text:

The plans will harm the New Jersey Shore, a major resort on the Coast of the United States. Beach house rentals will suffer. Commercial business will be harmed by loss of income. Residents of New Jersey and neighboring states will all suffer from the area being less attractive.

Comment Number: BOEM-2024-0008-1096-0010
Commenter Type: Individual
Commenter: Teresa Boyle-Vellucci

Comment Excerpt Text:

We have some questions that we have not yet seen addressed. What has been done/considered regarding the impact of the wind farms on the waters of our shores
for surfing, swimming and other recreation on the ocean? Will there be increased rip currents and safety concerns?

Comment Number: BOEM-2024-0008-1096-0009
Commenter Type: Individual
Commenter: Teresa Boyle-Vellucci

Comment Excerpt Text:

Another consideration that while it may seem a soft consideration, we believe is something worth consideration, mental health. There is a lot of lip service given by our elected official to the mental health crisis in our nation and the need to address the same. People often say that when driving onto LBI folks feel a real sense of relief, and this applies to our adult and adolescents population, and there is no question our young people are struggling more than ever. Long Beach Island is a place for vacationing and disconnecting from the stressors of life. These windfarms will ruin our community and comfort it gives to all those who come to LBI.

Comment Number: BOEM-2024-0008-1098-0002
Commenter Type: Individual
Commenter: Denise Boccia

Comment Excerpt Text:

Tourism and local seafood are extremely important and whale watching tours are more popular than ever. People from Washington don't seem to understand people from these communities and that's where the pushback comes from.

Comment Number: BOEM-2024-0008-1101-0003
Commenter Type: Individual
Commenter: Eileen Barker

Comment Excerpt Text:

More than 95 percent of boats sold in the USA are made in the US, and approximately 93 percent of boat manufacturers are small business owners.
Many coastal economies are built on recreational boating, fishing trips and the hospitality industry that requires access to the ocean. Building ocean wind turbine farms could have the potential to devastate these small businesses and economies.

The Tourist industry will be hit hard by building a huge wind farm. Tourists will have great difficulty finding peace and harmony in an ocean overtaken by 100/s of wind turbines.
The wind turbine project will have bright lights all night, humming sound, years of construction

Comment Number: BOEM-2024-0008-1111-0016
Commenter Type: Advocacy Group
Commenter: Jack Fullmer
Organization: New Jersey Council of Divers and Clubs

Comment Excerpt Text:

Sport divers/spearfishermen hope to be able to dive on designated wind turbines since Atlantic Shores Wind has assured us that electrical leakage would not occur.

Comment Number: BOEM-2024-0008-1111-0007
Commenter Type: Advocacy Group
Commenter: Jack Fullmer
Organization: New Jersey Council of Divers and Clubs

Comment Excerpt Text:

The wind turbine areas of Atlantic Shores North is prime diving territory for dive boats out of Barnegat Inlet and Little Egg Harbor inlets. It is an area I have dove for 50 or more years. It contains shipwrecks such as the Great Isaac, a giant tug that played an important role in pulling the artificial harbor into place for the WWll Normandy invasion. It also contains WWI wrecks such as the Chaparro and the tanker San Saba, and a multitude of other 19 and 20th century wooden wrecks. Atlantic Shores might consider buoying targets with strict orders to barge captains to stay a long way from any buoy during the cable laying phase.

Comment Number: BOEM-2024-0008-1112-0004
Commenter Type: Local Government
Organization: Sea Girt New Jersey

Comment Excerpt Text:

A concern regarding the potentially adverse impact the proposed development can have on the environment, marine water-life, and the waterfront community;

Comment Number: BOEM-2024-0008-1125-0001
Commenter Type: Individual
Commenter: Amy Covert

Comment Excerpt Text:

A study that I read has shown that 54 percent of renters would not return if the turbines are visible and even in the reports on the Bureau's website, it's -- it shows that these turbines will be visible. Even on cloudy days, they will be visible, so the tourism is going to be driven down if the project proceeds, the home values are going to plummet, the shops and the restaurants will be forced to close, the tax base is going to go down and basically the Jersey Shore especially Long Beach Island's economy will be decimated and at some point mostly uninhabitable due to the infrasound.

Comment Number: BOEM-2024-0008-1140-0003
Commenter Type: Individual
Commenter: John Magliochetti

Comment Excerpt Text:

Third, from an economic and tourist perspective, I question why we are willing to take such a significant risk with a major economic driver of the state. There are countless people whose livelihoods depend on the Jersey Shore.

Comment Number: BOEM-2024-0008-1153-0001
Commenter Type: Individual
Commenter: Penni Breitling

Comment Excerpt Text:

I feel multiple large wind turbine machines in the ocean as well as the damage to the ocean floor they will cause is disruptive to the Jersey Shore. I think the industrialization of the ocean will hurt the shore tourism, economy and the natural environment.

A lot of people like sitting on the beach and looking at the horizon or as I call it the edge of the world. It is a happy place for so many people. Instead, the horizon will look like an industrial park. The beautiful natural view will disappear.

Comment Number: BOEM-2024-0008-1183-0001
Commenter Type: Individual
Commenter: John Breitling

Comment Excerpt Text:

Long Beach Island doesn't have a boardwalk or casinos to attract tourists. Tourists come to LBI for its clean water and beautiful beaches. This has created an economy of businesses which support the tourists that are here to relax, swim and soak up the sunshine on the beach.

I am concerned the visible wind turbines will permanently devastate the tourist economy and property values on LBI. Atlantic Shores is installing the wind turbines that will be located in the ocean in an area between eight and 16 miles off LBI from Barnegat Light South to Holgate. I know this because I measured the distance on charts provided by Atlantic Shores.

Comment Number: BOEM-2024-0008-1198-0001
Commenter Type: Individual
Commenter: Tara MC Quaid

Comment Excerpt Text:

There is great concern, there is already studies about 25 percent reduction as far as tourism, 30 percent in the fishing industry, so as you go on and on, someone talked coral bleaching, well, what about the carpets, what about the basis that the turbines are going to wipe out the floor, the scallop beds, the shrimp beds, by the time they regenerate, it will be time to rebuild and destroy all over again.

A.3.11 Environmental Justice

Comment Number: BOEM-2024-0008-0053-0005
Commenter Type: Individual
Commenter: Ben Vitale

Comment Excerpt Text:

Power generation on land is inevitably sited where land is cheaper. This has unjust impacts against socially disadvantaged groups, including documented increases in respiratory disorders and other health impacts. Placing generation off shore does not discriminate against those groups. Arguably, it doesn't discriminate against anybody, but if anything you'll find opposition from wealthy coastal land owners. It is only fair they bear some of the impact of electricity generation.

Comment Number: BOEM-2024-0008-0121-0002
Commenter Type: Individual
Commenter: Enrique Nunez

Comment Excerpt Text:

This offshore wind project will help reduce air pollution leading to beneficial health outcomes, especially in communities of color that bear the brunt of emissions from fossil-fuel burning power plants and suffer disproportionate health impacts like asthma.

Comment Number: BOEM-2024-0008-0928-0003
Commenter Type: State Government
Organization: NJDEP

Comment Excerpt Text:

Stakeholder Engagement

NJDEP would like to emphasize the importance of stakeholdering and communication throughout project development. This stakeholdering is a necessary component of NJDEP's process, and we are committed to being transparent and accessible as offshore wind development in New Jersey proceeds. It is critical that BOEM and ASOW continue stakeholder engagement with local municipalities who may be impacted by the development of the windfarm as well as the commercial and recreational fisheries groups, and environmental justice communities.

Comment Number: BOEM-2024-0008-1007-0023
Commenter Type: State Government
Organization: New York State

Comment Excerpt Text:

{{Footnote 12: Please visit the State's Office of Environmental Justice (https://www.dec.ny.gov/public/333.html) for additional information on potential environmental justice areas and visit the New York State Climate Act website for additional information on disadvantaged communities (https://climate.ny.gov/Resources/Disadvantaged-Communities-Criteria)}}

Comment Number: BOEM-2024-0008-1028-0014
Commenter Type: Advocacy Group
Organization: BlueGreen Alliance

Comment Excerpt Text:

BOEM should also analyze opportunities for developers to invest in programs that prioritize the training of Justice40 communities, as well as disadvantaged and displaced workers, and provide wrap-around support services to support their enrollment. Disadvantaged workers include workers dislocated from fossil-fuel jobs, workers of color, women, formerly incarcerated workers, workers who live in environmental justice communities, workers with disabilities, and veterans. Workforce training investments should provide the option to enter into a memorandum of understanding with community stakeholders, unions, and companies and other strategies to support recruitment, retention, interviews upon completion, and successful placement of graduates in apprenticeships or internships. Lessees should consult with labor unions and community groups to ensure training investments result in increased equitable access to safe, quality jobs that will also provide more efficient operations.

Comment Number: BOEM-2024-0008-1028-0015
Commenter Type: Advocacy Group
Organization: BlueGreen Alliance

Comment Excerpt Text:

BOEM should also analyze language access needs for local communities to access jobs benefits and how to address the needs. Demographics such as language or education should be taken into account to ensure jobs and training are accessible to a diverse workforce. Any agreements that developers have made to

increase accessbe it to jobs in manufacturing, O&M, construction, or otherwiseshould be detailed to increase transparency and the local community's ability to access these resources and benefits

---

Comment Number: BOEM-2024-0008-1028-0016
Commenter Type: Advocacy Group
Organization: BlueGreen Alliance

Comment Excerpt Text:

BOEM should analyze how development in the lease areas can ensure that communities and Tribes receive the maximum possible benefits.

For example, CBAs are an important way to ensure that projects provide real and meaningful community benefits. CBAs can be expansive in scope and are often negotiated with both union and community partners. Because they are legally-binding agreements, they provide a higher level of accountability and enforceability and can therefore help ensure that specific workforce and community benefits are provided. CBAs can ensure that developers are held accountable for providing the benefits they promise, and that community groups have a say in the development process. Local Hire provisions, often included in CBAs, are another important tool to support the hiring of workers from within the state or local community. Without this provision, work crews from out of state can be brought in, minimizing the job creation benefits for the local community. BOEM should analyze the benefits of requests made by local communities, such as requests for CBAs or community governance of the offshore wind project.

Comment Number: BOEM-2024-0008-1028-0018
Commenter Type: Advocacy Group
Organization: BlueGreen Alliance

Comment Excerpt Text:

BOEM should analyze the benefits derived from offshore wind developers conducting appropriate benthic surveys for cable routes and other activities that may exacerbate existing contamination from urban and storm runoff, industry, or historic use of the site. Pre-construction, construction, and post-construction monitoring should be conducted, especially in areas of known vulnerability such as those adjacent to known sources of contaminants or near environmental justice communities.

Comment Number: BOEM-2024-0008-1028-0019
Commenter Type: Advocacy Group
Organization: BlueGreen Alliance

Comment Excerpt Text:

BOEM should analyze the extent of needed Tribal consultation. In line with the lease stipulations, developers must ensure that all impacted Tribes are properly consulted, including state-recognized Tribes, and non-federally recognized Tribes in a geographic analysis area that is representative of their historical presence in the region. Robust consultation with Tribes should be extended to relevant activities that take place out of the state or region.

Comment Number: BOEM-2024-0008-1069-0026
Commenter Type: Advocacy Group
Organization: Clean Ocean Action

Comment Excerpt Text:

Environmental justice communities are often promised that wind projects will improve local air quality and potentially alleviate the health effects that fossil fuel generation poses to which low-income communities and communities of color are disproportionately exposed. [Footnote 35: Timothy Q. Donaghy et al, Fossil fuel racism in the United States: How phasing out coal, oil, and gas can protect communities, 100 ENERGY RESCH. https://doi.org/10.1016/j.erss.2023.103104] This can only be accurate, however, if wind turbine installations actually displace a significant amount of fossil fuel energy generation. Wind energy cannot yet operate without a fossil-fuel backup source of energy to balance the current gaps in reliability, especially with energy storage systems and grid modernization projects in very early stages of development. [Footnote 36: https://www.sciencedirect.com/science/article/pii/S030626192101093X#s0100;] Atlantic Shores' estimate of avoided greenhouse gas emissions does assume that the turbines will operate at 50% capacity and 4% of the energy generated will be lost during transmission, which improves its accuracy. [Footnote 37: ATLANTIC SHORES OFFSHORE WIND CONSTRUCTION & OPERATIONS PLAN, Appx. II-C, at II-C-32] However, this reduction is across the board and does not necessarily translate to air quality improvements
where they are most needed. If fossil fuel generators must still continue to operate, they will do so in the overburdened communities in which they are most commonly sited, and those communities will continue to bear a higher portion of the costs than the overall benefits. The EIS should consider whether, accounting for back-up generation needed for the Atlantic Shores North project, the environmental justice benefits from the project are being overstated.

Comment Number: BOEM-2024-0008-1069-0027
Commenter Type: Advocacy Group
Organization: Clean Ocean Action

Comment Excerpt Text:

An environmental justice analysis for any industrial-scale wind project would be incomplete without considering the impacts of additional manufacturing, the locations where
cables make landfall, and mining the materials needed to construct turbines of the number and size required for industrial wind projects. BOEM must ensure that environmental justice communities do not bear a disproportionate amount of the adverse impacts from construction activities necessary to install the export cables. Additionally, manufacturing facilities that produce harmful air and water pollution are disproportionately located in overburdened communities, [Footnote 38: Vasanthakumar N. Bhat, Polluting Facilities and Environmental Justice A Study, 62 INT'L J. ENV'T STUDIES (2005), https://doi.org/10.1080/00207230290011508a] so BOEM
must consider this when approving projects that will necessitate increased manufacturing.

Comment Number: BOEM-2024-0008-1069-0028
Commenter Type: Advocacy Group
Organization: Clean Ocean Action

Comment Excerpt Text:

Mining minerals essential to turbinessuch as lithium, copper, graphite, zinc, cobalt, copper, and nickel, and rare earth metal compoundscontaminates local water resources, generates waste, and can contribute to

abusive labor and human rights practices depending upon where it occurs. [Footnote 39: https://climate.mit.edu/ask-mit/will-mining-resources-needed-clean-energy-cause-problems-environment] Processing sites for rare earth metals are typically located in developing countries, and environme ntal harms disproportionately affect disadvantaged communities within the selected country. [Footnote 40: Id., https://www.mdpi.com/2079-9276/3/1/123.] "Without adequate consideration, the transition to low-carbon energy technologies will not lead to more sustainable societies, but rather "produce and, in many cases, perpetuate pre- existing sets of winners and losers". [Footnote 41: https://doi.org/10.1016/j.jenvman.2022.116711 (quoting S. Carley, D.M. Konisky, The justice and equity implications of the clean energy transition 5 Nat. Energy, at 569-577, (2020))]

Comment Number: BOEM-2024-0008-1069-0029
Commenter Type: Advocacy Group
Organization: Clean Ocean Action

Comment Excerpt Text:

BOEM's analysis of environmental justice issues in the EIS must include both the problem of continuing reliance on fossil fuels for balancing as well as the impacts from manufacturing, landfall site activities, and mining.

Comment Number: BOEM-2024-0008-1094-0010
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

While purporting to reflect Environmental Justice, the proposed action impoverishes other communities. Likewise, new jobs purportedly to be created in the region will not compensate for jobs lost in commercial fishing and tourist industry.

Comment Number: BOEM-2024-0008-1106-0068
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

Environmental Justice
The NEPA document should address effects of the Project on Environmental Justice, including those specific to fishing communities with minority and low-income populations. We anticipate Environmental Justice concerns will be included as required under Executive Order 12898 (E.O. 12898, 59 FR 7629; February 16, 1994) federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. For more information please refer to the Additional Information section below.

Comment Number: BOEM-2024-0008-1108-0025
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

Environmental Justice

- EPA Region 2 is committed to promoting the principles of environmental justice outlined in Executive Order 12898 - Federal Actions to Address Environmental Justice in Minority and Low-income Populations. According to the Executive Order, "Each Federal Agency shall analyze the environmental effects, including human health, economic and social effects, of Federal actions, including effects on minority communities and low-income communities, when such analysis is required by NEPA. Mitigation measures outlined or analyzed in an environmental assessment, environmental impact statement, or record of decision, whenever feasible, should address significant and adverse environmental impacts of proposed Federal actions on minority communities and low-income communities."

Comment Number: BOEM-2024-0008-1108-0026
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

- Also, Executive Order 12898 was supplemented by Executive Order 14096, Revitalizing Our Nation's Commitment to Environmental Justice for All, April 26, 2023 which directs federal agencies, as appropriate and consistent with applicable law: to identify, analyze, and address disproportionate and adverse human health and environmental effects (including risks) and hazards of Federal activities, including those related to climate change and cumulative impacts of environmental and other burdens on communities with environmental justice (EJ) concerns. Agencies are directed to consider historic inequities and barriers to receiving equitable access to health and environmental benefits in communities with EJ concerns (including persons with disabilities). EO 14096 also directs EPA to assess whether each agency analyzes and avoids or mitigates disproportionate human health and environmental effects on communities with EJ concerns in carrying out its Clean Air Act Section 309 responsibilities. EPA recommends that relevant provisions of EO 14096 are incorporated in the development of the EIS.

Comment Number: BOEM-2024-0008-1108-0027
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

- We acknowledge Atlantic Shore's commitment to managing activities such that communities with EJ concerns and disadvantaged communities are not disproportionately excluded from receiving benefits from the Project. Potential impacts related to communities with EJ concerns should be clearly described and quantified where possible and presented separately from any anticipated benefits. Promising Practices for EJ methodologies states: "Agencies should not balance adverse impacts that directly affect human health at levels of concern, especially those that exceed health criteria, with project benefits." (https://www.epa.gov/environmentaljustice/ej-iwg-promising-practices- ej-methodologies-nepa-reviews)

Comment Number: BOEM-2024-0008-1108-0028
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

- EPA recommends that noise, air, lighting, and traffic impacts to the community from construction and

project operations be considered in the EIS. In conducting outreach, we recommend that BOEM and the project proponent provide materials in other languages in order to more effectively engage populations with limited English proficiency.

Comment Number: BOEM-2024-0008-1124-0004
Commenter Type: Advocacy Group
Commenter: Anjuli Ramos
Organization: Sierra Club

Comment Excerpt Text:

Power plants are also most often located in Black and Latino communities, where families face the health consequences of fossil fuel pollution. Children who are Black or Latino, or who live in families who are low-income, have higher rates of asthma. 1 in 4 children who grow up in Newark are diagnosed with asthma. This can go on no more. OSW development will aid in cleaning our air, relieve communities of this disproportionate burden, and advance environmental justice.

Comment Number: BOEM-2024-0008-1193-0001
Commenter Type: Individual
Commenter: Pauline Thomas

Comment Excerpt Text:

Offshore wind saves lives. The sooner we switch to offshore wind energy, the better our chances of mitigating the worst impacts of climate change. Climate and health are interconnected. New Jersey communities particularly low income underserved areas are at risk of severe health effects of climate change.

In New Jersey more than 600,000 adults and 167,000 children have asthma. Blacks, Hispanics and urban residents are more likely to be effected with asthma symptoms which are aggravated by pollution. Additional health impacts include temperature related death and illness and flooding leading to seepage of contaminants into waterways. All of these concerns are intertwined with the potential mental health impacts on coastal populations.

A.3.12 Finfish, Invertebrates, and Essential Fish Habitat

Comment Number: BOEM-2024-0008-0006-0001
Commenter Type: Individual
Commenter: Donna Piraino

Comment Excerpt Text:

With all due respect, do you sincerely believe that continuing to build these offshore windmills are not going to negatively affect the marine ecosystem with irreversible impacts?Hundreds of Whales and dolphin have been beaching themselves of have washed up onshore dead over the past year. Who knows how many have died and the carcasses simply have sunk to the ocean floor? The necropsies are being done by facilities that have accepted "donations" (payoffs) from Offshore Wind Projects. Why on earth would these facilities tell anyone that the offshore wind projects have anything to do with these deaths? Cause of death is repeatedly "ship strike" or "entanglement" but not all of these animals show evidence of that. I know that I am only one voice. I am livid that these projects continue without even caring in the least of the devastation they are causing. Marine life that have to migrate the East Coast will have to navigate through the chaos. Ground fish will have thousands of acres of habitat destroyed.

Comment Number: BOEM-2024-0008-0071-0002
Commenter Type: Individual
Commenter: Doreen Pavese

Comment Excerpt Text:

Please reconsider. Our wildlife is already washing up dead. I can only imagine the horrendous effect this project will have on them.

Comment Number: BOEM-2024-0008-0138-0042
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

Atlantic Shores offshore wind developer claims that the project will attract recreational fishing as a result of a "reef affect" as mentioned in a Block Island study, (Analysis of the Effects of the Block Island Wind Farm on Rhode Island Recreation and Tourism Activities, BOEM, Smythe, et al. University of Rhode Island, Dec 2018). This is a total misrepresentation of the study in that Block Island project consists of jacket foundations and Atlantic Shores project foundations will be monopiles unless the developer makes a change to its decision.

Comment Number: BOEM-2024-0008-0138-0051
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

A recent study published in the peer-reviewed journal Nature Communications found offshore wind industrial facilities do previously unrecognized harm to marine ecosystems. A team of scientists from various German research institutes and universities examined industrial wind projects in the North Sea, where the world's largest offshore wind project is found. Quantitative modeling conducted for the study indicates that the "wind wake" effect of offshore wind farms could dampen annual primary production in the area encompassed and beyond by the wind farms by more than 10 percent. Less food for fish or endangered whales is not a "moderate" or "beneficial" impact. The same modeling indicates offshore industrial wind projects slow ocean currents, resulting in decreased cycling of dissolved oxygen in and around wind projects, which produces low oxygen concentrations. Lower oxygen levels are also detrimental to marine life. The authors ultimately conclude that "off shore wind farm developments can have a substantial impact on the structuring of coastal marine ecosystems on basin scales." Separately, these negative effects on the marine ecosystem in offshore wind farm areas indicate the ASOWNJ project will harm many species and disrupt ecosystem interconnections. Cumulatively, the harm will probably be much greater, wreaking great harm on all marine life.

Comment Number: BOEM-2024-0008-0147-0002
Commenter Type: Individual
Commenter: Regina Littwin

Comment Excerpt Text:

As far as irreparable environmental damage is concerned, the eight substations alone will suck up 8,000,000 gallons of ocean water EACH and heat it up to 86-90 F with chlorine residuals and spew it back into the ocean. Cooking and killing plankton, microbes, and fish larvae each and every day.

Secondly, when one thinks of plastic pollution in the ocean and/or environmental impacts, I am reminded of the whale that had died because it ate large amounts of plastic that it thought was food. Let's not forget the ban on plastic bags in our state of New Jersey either. This is a serious environmental hazard since Bisphenol A and epoxy compounds are two of the main components of turbine blades which are a polycarbonate plastic which the blades will wear and peel due to the harsh conditions at sea. Again, plankton, microbes, and fish larvae will mistake these particles as a food source as these particles fall into the ocean. What is more disturbing, is the fact that a lot of bisphenols and other toxins are released from the particles when they enter the intestinal tract, which often has an acidic environment with low PH. In the end, a lot of these toxins will end up on our own dinner plate.
There is a very disturbing study that shows that Bisphenol A causes genetic damage for several generations in rainbow trout. Small concentrations of Bisphenol A damages the fertility of humans and ALL organisms. We will be risking irreparable damage to the entire environment both on land and at sea if we do not limit or stop the use of such substances, especially in the deployment of wind power plants in an increasingly demanding environment like our ocean.

Comment Number: BOEM-2024-0008-0527-0001
Commenter Type: Individual
Commenter: Rose Willis

Comment Excerpt Text:

The cables for these projects pose environmental harm to an ecosystem. Instead of just running them to shore they're being ran up the coast. That alone speaks volumes and says these projects aren't about the environment but instead they're about greed. What happens to the surf clams? Putting an electric fence around our estuaries where fish spawn will have consequences.

Comment Number: BOEM-2024-0008-0586-0008
Commenter Type: Individual
Commenter: Theresa Teti

Comment Excerpt Text:

All the fish, scallops that live on the Ocean floor will be destroyed. The American people should get a vote on this. More than just a survey.

Comment Number: BOEM-2024-0008-0924-0001
Commenter Type: Individual
Commenter: Barbara Skinner

Comment Excerpt Text:

No mention of protections for the Horseshoe crabs in and around NJ and the mouth of the DE Bay?? Instead, quite to the contrary, one offshore wind installation is being planned in the very heart of breeding grounds for the extremely rare 600 million yr old horseshoe crab population???

Comment Number: BOEM-2024-0008-0969-0008
Commenter Type: Local Government
Organization: Long Beach Township, NJ

Comment Excerpt Text:

COLD POOL
- Cumulative analysis of impacts to stratification of marine layers and associated biological production and nutrient cycling
- Cumulative analysis of impacts to water oxygen levels

Comment Number: BOEM-2024-0008-0974-0001
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

The construction and installation of offshore wind turbines and associated infrastructure can disturb and damage sensitive marine habitats like coral reefs, seagrass beds, and fish spawning grounds. The foundations and scour protection can permanently alter and fragment these areas, impacting the species that rely on them.

Comment Number: BOEM-2024-0008-1069-0024
Commenter Type: Advocacy Group
Organization: Clean Ocean Action

Comment Excerpt Text:

Offshore wind installations could potentially change the patterns of the cold pool due to the structures themselves and the extraction of wind changing the naturally occurring current.

Comment Number: BOEM-2024-0008-1069-0025
Commenter Type: Advocacy Group
Organization: Clean Ocean Action

Comment Excerpt Text:

Offshore wind installations could potentially change the patterns of the Cold Pool due to the structures themselves and the extraction of wind changing the naturally occurring current. [Footnote 29: Miles et al, supra note 22, at 10] "Turbines can disturb downwind wind fields by decreasing wind speed and increasing turbulence". [Footnote 30: L. Bennun et al, Biodiversity Impacts Associated to Offshore Wind Power Projects, INT'L UNION FOR CONSERVATION OF NATURE (2021), https://www.iucn.org/sites/default/files/2022-06/01_biodiversity_impacts_associated_to_off-shore_wind_power_projects.pdf.] This is known as the "wind wake effect," and it can cause both upwelling and
downwelling, changing the distribution of temperature and nutrients, "potentially affecting an area 10-20 times larger than the wind farm itself, with possible knock-on ecosystem effects." [Footnote 31: Id.; see also Ute Daewel et al, Offshore wind farms are projected to impact primary production and bottom water deoxygenation in the North Sea, 3 COMMS. EARTH & ENV'T (Nov. 24, 2022) https://doi.org/10.1038/s43247-022- 00625-0 (Wind wake effects can increase or decrease zooplankton productivity by up to 10%)] In particular, wind farms proposed in the North Sea were modeled to increase precipitation by approximately 5% and also increased cloud cover. [Footnote 32: Naveed Akhtar et al,

Impacts of Accelerating Deployment of Offshore Windfarms on Near-surface Climate, NATURE (Oct. 31, 2022), https://www.nature.com/articles/s41598-022-22868-9.] "Moreover, the identified offshore windfarm impacts on the sea surface climate and the introduced spatial pattern in atmospheric conditions, in particular the modeled wind speed changes, suggest potential impacts on local ocean dynamics and the structure of the marine ecosystem" [Footnote 33: Id] The wind wake effect also reduces the amount of electricity that downwind turbines are able to generate; power losses have been estimated at 10 to 20%. [Footnote 34: R. J. Barthelmie et al, Modelling and measuring flow and wind turbine wakes in large wind farms offshore, 12 WIND ENERGY (June 26, 2009), https://doi.org/10.1002/we.348.]

Comment Number: BOEM-2024-0008-1106-0010
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

The proposed Atlantic Shores North Project is located in the Mid-Atlantic Bight, in an area characterized by shore-parallel, northeast-southwest oriented sand ridges and troughs (i.e., shoreface sand ridges), and various crests, slopes, depressions, and flats. Benthic features (e.g., sand ridges and banks; ridge and swale complexes) and mosaics of complex and soft bottom habitats are vulnerable to permanent impacts or may take years to decades to recover from certain impacts such as bedform removal. The Project area also overlaps with designated New Jersey Prime Fishing Areas (in accordance with N.J.A.C. 7:7-9.4) and designated artificial reefs which are important areas of high fish production, high benthic faunal density, and species diversity as well as dense aggregations of fish which are likely supported by high local primary production.

Comment Number: BOEM-2024-0008-1106-0011
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

Inshore and estuarine habitats in Raritan Bay/Lower Bay are home to species such as winter flounder, hard clam (Mercenaria mercenaria), striped bass (Morone saxatilis), and blue crab (Callinectes sapidus). Time of year restrictions (TOYR) for construction and operation activities, primarily dredging, will likely be necessary from November 15 to May 31 for blue crab, striped bass and winter flounder to avoid impacts to these species' sensitive overwintering, spawning and nursery habitats. In addition, sediments in nearshore/estuarine habitats may be contaminated with high levels of organic and inorganic pollutants and thorough testing should be performed to better understand toxin levels and potential impacts of sediment resuspension and disposition on filter-feeding organisms as well as impacts of turbidity on SAV and other marine resources. If dredging is proposed, a compatible disposal location should be determined and any potential impacts of disposal on local species should be evaluated. In particular, species such as winter flounder could be affected because they have adhesive or demersal eggs or neutrally buoyant larvae which are particularly sensitive to actions such as dredging and trenching. Landfall locations should evaluate impacts of dredging, pier modifications/construction, HDD operations, and cumulative impacts of other projects proposing to use the same connection points.

Comment Number: BOEM-2024-0008-1106-0012
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

For the benthic resources, finfish, invertebrates and EFH sections of the EIS, the "Affected Environment" discussion should include an assessment of species status, anticipated biomass abundance and distribution trends if available, and habitat requirements including benthic, demersal, bentho- pelagic, and pelagic species and infaunal, emergent fauna, and epifaunal species living on and within surrounding substrates. These EFH resources, HAPCs, and other sensitive habitats or unique features should be clearly identified, described, and mapped in the Affected Environment section. This section should also fully describe the importance of different habitat types for providing structure and refuge at various life stages of EFH species (adults, juveniles, larvae, eggs). We recommend the EIS include figures and site plans that visualize benthic resources and habitats overlain with the details of the proposed action. For more information on EFH and HAPCs please refer to the Additional Information section below.

Comment Number: BOEM-2024-0008-1106-0015
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

NOAA Scientific Surveys
The following 11 surveys overlap with Atlantic Shores North and will need to be mitigated to account for preclusion from the development area:
- Atlantic Marine Assessment Program for Protects Species - both aerial and from vessels
- Multispecies Bottom Trawl survey - both spring and fall
- Ecosystem Monitoring survey
- Ocean Quahog survey
- Scallop survey
- Surf clam survey
- North Atlantic Right Whale survey
- Sea Turtle Ecology survey
- Seal abundance survey

The "Affected Environment" section should include a full description of scientific surveys to be impacted, the history of each time series, and the relative importance of the impacted scientific surveys on management advice, decision-making, and other end-users.

Comment Number: BOEM-2024-0008-1106-0038
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

- Disruption, loss, and conversion of habitat that may affect the use of the area, alter prey assemblages, or result in the mortality or displacement of individuals during all phases of the proposed Project;

Comment Number: BOEM-2024-0008-1106-0039
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

- Impacts of novel, artificial hard substrate on predator-prey relationships, invasive species spread, fish aggregations (and fishing pressure), changes to hydrodynamics and altered biogeochemical properties of surrounding habitats;

Comment Number: BOEM-2024-0008-1106-0004
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

Resources under NMFS Jurisdiction
To be successful in meeting the Administration's goal for responsible offshore wind development, we must identify, understand, and fully consider the effects of large-scale development of offshore wind projects on marine resources and fisheries and work to avoid and minimize potential adverse effects. The project area overlaps with marine resources under NMFS jurisdiction that may be adversely impacted by project development. Specifically, the project area is characterized by high fish production, species diversity, and benthic faunal density resulting in part from the occurrence of a mosaic of complex hard and soft bottom habitats. The high-quality Atlantic surfclam habitat within the lease supports areas of high value to the surfclam fishery. Additionally, the export cable route overlaps with areas of complex habitats and concentrations of hard clams in Raritan Bay. Protected species, including marine mammals, sea turtles, and fish, also overlap with the project area. We encourage you to consider the information and recommendations in the recently completed BOEM/NMFS North Atlantic Right Whale and Offshore Wind Strategy as you move this project through the environmental review process.

Comment Number: BOEM-2024-0008-1106-0042
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

- Project lighting as a potential attractant;

Comment Number: BOEM-2024-0008-1106-0047
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

- Impacts of any surveys that may occur following potential COP approval (e.g., gillnet or trawl surveys to characterize fisheries resources, pre- or post- construction monitoring) including potential for entanglement, injury, and mortality of listed species from proposed fisheries surveys;

Comment Number: BOEM-2024-0008-1106-0052
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

- Impacts to species recruitment and larval distribution due to changes to ocean stratification and circulatory patterns;
- Locations and impacts of proposed dredging and dredge material disposal, including impacts to adhesive or demersal eggs or neutrally buoyant larvae which are particularly sensitive to actions such as dredging and trenching;

Comment Number: BOEM-2024-0008-1106-0054
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

- Short-term, long-term and permanent changes to EFH, federally managed species and their prey during construction, operation, and decommissioning of the Project;

Comment Number: BOEM-2024-0008-1106-0069
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

Habitat Mapping
To understand project effects on benthic resources and EFH, we recommend high-resolution benthic habitat mapping be conducted to characterize and delineate habitats in the project area. We recommend that benthic surveys be conducted consistent with our Recommendations for Mapping Fish Habitat [Footnote 13: https://media.fisheries.noaa.gov/2021-03/March292021_NMFS_Habitat_Mapping_Recommendations.pdf?null]. This habitat data should be used in the development of project alternatives that avoid ecologically sensitive benthic habitats such as complex hard bottoms and benthic features (e.g. sand waves). To help inform scoping of alternatives and prepare your evaluation of impacts to habitats in the project area, we recommend the data be shared with NMFS as soon as possible. Habitat maps and associated data should be included as figures in the EIS for all project activities within the lease area, export cable corridors, landfall locations, and any associated activities such as port development/redevelopment. For the purposes of our EFH consultation, we recommend habitat data be provided in GIS format through a web-based viewer. Additional information related to EFH Consultation with our agency is described below.

Comment Number: BOEM-2024-0008-1106-0007
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

Resources under NMFS Jurisdiction
The project area overlaps with important habitats used by species protected under the Endangered Species Act (ESA) and Marine Mammal Protection Act (MMPA) and managed by the Magnuson Stevens Fishery Conservation Management Act (MSA), Atlantic Striped Bass Conservation Act, and Atlantic Coastal

Fisheries Cooperative Management Act. The project area is also important for fishing and coastal communities that depend on such resources. The EIS should identify and describe all potential marine resources and ocean users that may be affected by the Atlantic Shores North project (Project), including the status of such resources and any anticipated trends in resources over the life of the project, as appropriate. Specifically, the "Affected Environment" section of the EIS should include a description of all the physical, biological, cultural, and socioeconomic factors related to marine resources that may be affected by the Project. Below we provide information related to marine resources of concern in the Project area. This includes resources within and adjacent to the lease area and along the cable route. For additional resources, please also refer to the materials provided in the Additional Information section below.

Comment Number: BOEM-2024-0008-1106-0072
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

EFH Consultation

As currently described in the NOI and as discussed above in the Affected Environment section, the Project will be constructed, operated, maintained, and decommissioned in areas designated for EFH for various life stages of species managed by the New England Fishery Management Council (NEFMC), Mid-Atlantic Fishery Management Council (MAFMC), South Atlantic Fishery Management Council (SAMFC), and NMFS. The MSA requires federal agencies to consult with the Secretary of Commerce, through NMFS, with respect to "any action authorized, funded, or undertaken, or proposed to be authorized, funded, or undertaken, by such agency that may adversely [Footnote 16: The EFH final rule published in the federal Register on January 17, 2002, defines an adverse effect as: "any impact which reduces the quality and/or quantity of EFH." An adverse effect may include direct or indirect physical, chemical, or biological alterations of the waters or substrate and loss of, or injury to, benthic organisms, prey species and their habitat and other ecosystems components, if such modifications reduce the quality and/or quantity of EFH. Adverse effects to EFH may result from actions occurring within or outside EFH and may include site-specific or habitat-wide impacts, including individual, cumulative, or synergistic consequences of actions] affect any essential fish habitat identified under this Act," (16 U.S.C. 1855(b)(2)). Pursuant to the MSA, each Fisheries Management Plan (FMP) must identify and describe EFH for the managed fishery [Footnote 17: The statute defines EFH as "those waters and substrates necessary to fish for spawning, breeding, feeding or growth to maturity" 16 U.S.C. 1853(a)(7) and 1802(10). NOAA's regulations further define EFH: "waters" include aquatic areas and their associated physical, chemical, and biological properties that are used by fish and may include aquatic areas historically used by fish where appropriate; "substrate" includes sediment, hard bottom, structures underlying the waters, and associated biological communities; "necessary" means the habitat required to support a sustainable fishery and the managed species' contribution to a healthy ecosystem; and "spawning, breeding, feeding, or growth to maturity" covers a species' full life cycle.]. The EFH regulations state that for any federal action that may adversely affect EFH, federal agencies must provide NMFS with a written assessment of the effects of that action on EFH (50 CFR 600.920(e)). This EFH Assessment should include analyses of all potential impacts, including temporary and permanent, direct and indirect, individual, cumulative, and synergistic impacts of the proposed Projects.

Comment Number: BOEM-2024-0008-1106-0073
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

The EFH Assessment must include 1) a description of the proposed action, 2) an analysis of the potential adverse effects of the action on EFH and the managed species, 3) the federal agency's conclusions regarding the effects of the action on EFH, and 4) proposed mitigation, if applicable (50 CFR 600.920(e)(3)). Due to the potential for substantial adverse effects to EFH from the proposed Project, an expanded EFH consultation as described in 50 CFR 600.920(f) is necessary. The expanded EFH Assessment should contain additional information on 1) the results of an on- site inspection to evaluate the habitat and the site specific effects of the Projects [Footnote 18: This includes project specific data collection and habitat mapping. Our 2021 Recommendations for Mapping Fish Habitat describe our recommended approach for acquiring the data needed in the EFH Assessment and are found here: https://www.fisheries.noaa.gov/new-england-mid- atlantic/science-data/technical-guidance-offshore-wind-energy-projects-greater-atlantic-region], 2) the views of recognized experts on the habitat or species that may be affected, 3) a review of pertinent literature and related information, 4) an analysis of alternatives to the action, and 5) other relevant information. The expanded EFH consultation process allows the maximum opportunity for NMFS and BOEM to work together to review the Project's impacts on EFH and federally managed species, and for our agency to develop EFH conservation recommendations (CRs) to avoid, minimize, or offset adverse effects to EFH and federally managed species. In addition to these mandatory elements, the EFH Assessment for this Project should incorporate the specific EFH resource concerns included in the NOAA Trust Resources, Affected Environment and Environmental Consequences sections above.

Comment Number: BOEM-2024-0008-1106-0074
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

We understand BOEM permits the use of a PDE in the preparation of a COP, and the EIS will focus on analysis of the maximum impacts that could occur from the range of design parameters. However, the EFH assessment should be consistent with the EFH regulations under the MSA which require the assessment of the potential adverse impacts that would actually occur as a result of all parameters under consideration, rather than under a maximum impact scenario. This means that all possible lease layout configurations, foundation types, cable routes, landfall location, associated connected actions, and methods for construction that are included in the PDE must be independently analyzed. Should the EFH assessment provide insufficient details to assess impacts of the Project actions, we may determine that the Assessment is incomplete and that consultation under the MSA cannot be initiated, or we may provide more conservative or precautionary EFH CRs. Early communication and coordination efforts are encouraged to streamline the consultation process and avoid project delays. All data related to habitat mapping (acoustic survey results, seafloor sampling data, GIS data, figures/maps, etc.) should be shared directly with us in usable geographic information system (GIS) format (or cloud-based GIS data viewer) as soon as it is available, as well as in maps and figures within the assessment. Various materials to aid BOEM and the Project applicant in the development of comprehensive and complete EFH assessments are provided below in the Additional Information section.

Comment Number: BOEM-2024-0008-1106-0075
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

Fish and Wildlife Coordination Act

The Fish and Wildlife Coordination Act (FWCA) provides authority for our involvement in evaluating impacts to fish and wildlife from proposed federal actions that may affect waters of the United States. The FWCA requires that wildlife conservation be given equal consideration to other features of water resource development programs through planning, development, maintenance, and coordination of wildlife conservation and rehabilitation. The Act does this by requiring federal action agencies to consult with NMFS "with a view to the conservation of wildlife resources by preventing loss of and damage to such resources as well as providing for the development and improvement thereof in connection with such water-resource development" (16 USC 662.) One of the reasons that Congress amended and strengthened the FWCA in 1958 was that it recognized that "[c]ommercial fish are of major importance to our nation[,]" and that federal permitting agencies needed general authority to require "in Project construction and operation plans the needed measures for fish and wildlife conservation" S.Rep. 85-1981 (1958). As a result, our FWCA recommendations must be given full consideration by federal action agencies. Consultation with NMFS under the FWCA may occur concurrently with the EFH consultation under the MSA.
Under the FWCA, our authority extends to numerous other aquatic resources in the area of the proposed Project, including, but not limited to, the following species and their habitats: striped bass (Morone saxatilis), American shad (Alosa sapidissima), alewife (Alosa pseudoharengus) and blueback herring (Alosa aestivalis) (collectively known as river herring), Atlantic menhaden (Brevoortia tyrannus), Atlantic silversides (Menidia menidia), hard clam (Mercenaria mercenaria), Eastern oyster (Crassostrea virginica), blue mussel (Mytilus edulis), tautog (Tautoga onitis), weakfish (Cynoscion regalis) and other assorted fish and invertebrates. NOAA jointly manages a number of these species through Interstate FMPs with the Atlantic States Marine Fisheries Commission. A list of Commission species and plans can be found on their website at http://www.asmfc.org. We anticipate all of these species will be included in your impact assessments, both in the EFH assessment and NEPA document. We also expect the assessment to include impacts to the recreational and commercial fishing communities that rely on these species. The behaviors and habitat needs of diadromous and estuary-dependent fishes and invertebrates (associated with cable route locations) may not be represented by a discussion solely of the surrounding marine fishes in the WTG area. The discussion for FWCA species should consider locally important species to evaluate the Project's impacts to organisms or populations associated with the various trophic levels and life history stages known to occupy the Projects' area as residents or transients.

Comment Number: BOEM-2024-0008-1106-0009
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

Essential Fish Habitats
The Project is proposed to be constructed in or directly adjacent to important habitat for numerous federally-managed species and their prey. Species for which Essential Fish Habitat (EFH) has been designated in the Project area include but are not limited to Atlantic surfclam (Spisula solidissima), ocean quahog (Arctica islandica), sea scallop (Placopecten magellanicus), scup (Stenotomus chrysops), clearnose skate (Raja eglanteria), longfin squid (Doryteuthis pealeii), winter flounder (Pseudopleuronectes americanus), black sea bass (Centropristis striata), and summer flounder

(Paralichthys dentatus). The Project area is also designated EFH for several Atlantic highly migratory species including tuna, swordfish, billfish, and small and large coastal sharks and pelagic sharks such as sandbar shark (Carcharhinus plumbeus) and sand tiger shark (Carcharias taurus). The sand tiger shark has been listed as a Species of Concern by NOAA [Footnote 3: "Species of concern" are species about which we have some concerns regarding status and threats, but for which insufficient information is available to indicate a need to list the species under the ESA (69 FR 19975; April 15, 2004)]. Habitat Areas of Particular Concern (HAPCs) are a subset of EFH that are especially important ecologically, particularly susceptible to human-induced degradation, vulnerable to developmental stressors, and/or are rare. Juvenile summer flounder inhabit a variety of inshore coastal and estuarine habitats, including submerged aquatic vegetation (SAV; eelgrass and other species). Any area with SAV is designated as a HAPC for summer flounder and should be avoided due to its ecological value.

Comment Number: BOEM-2024-0008-1117-0002
Commenter Type: Individual
Commenter: Penny Applegate

Comment Excerpt Text:

The harm to the marine life, the fishing and clamming the bird life from expected running operations. We just had the oyster population starting to regenerate.

Comment Number: BOEM-2024-0008-1122-0007
Commenter Type: Individual
Commenter: Anonymous

Comment Excerpt Text:

DETRIMENT TO THE ECOLOGY OF THE OCEAN

- Threat to fisheries, marine mammals, birds

- Cold pool disruption & fish habitat destruction

Comment Number: BOEM-2024-0008-1169-0004
Commenter Type: Local Government
Commenter: Justin Macko
Organization: Borough of Sea Girt

Comment Excerpt Text:

Beyond that the Borough objects to this expensive, impractical and environmentally unsound proposal for the placement of offshore wind turbine clusters, the trenching of the wires from the turbine clusters, sources to the land will require cutting into and disrupting essential fish habitat protected by the Magnuson Steven Act.

A.3.13 Land Use and Coastal Infrastructure

Comment Number: BOEM-2024-0008-0138-0006
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

The COP fails to address that the project will reduce breeze, about 26%, wave, and higher temperature and humidity at the shore, are expected based on a BOEM study for NY,; no study done for NJ.

Comment Number: BOEM-2024-0008-0569-0004
Commenter Type: Individual
Commenter: Craig Osten

Comment Excerpt Text:

here are open questions surrounding the de-commissioning of these turbines when their useful life comes to an end. How will they be removed ? What will be the impact on the shore if they are left out there. Has Atlantic shores guaranteed their removal ?

Comment Number: BOEM-2024-0008-0611-0030
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

The EIS needs to provide an analysis of reduced wind and breeze at the shore from the extraction of the normal wind energy by the wind turbines. It was stated at the NOI virtual meeting on April 16 that that was not a problem. However, that is contradicted by the Arc Vera study done for New York State by the BOEM. The contour maps of wind velocity deficit from that study at a 9-mile distance from a similar wind complex, show a wind speed deficit of about 25 percent. A similar study needs to be done for this EIS and these closer distances.

Comment Number: BOEM-2024-0008-1108-0044
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

Environmental Considerations
- EPA recommends that the EIS acknowledge any relevant Comprehensive Conservation Management Plans (CCMPs) and addresses the regulatory processes to ensure the protection of water quality and wetlands. As the potential impacts of the proposed action extend beyond water quality and impacts, we encourage BOEM to consider how the proposed action may help or hinder achievement of all of the CCMP goals including water supply, land use, and living resources.

Comment Number: BOEM-2024-0008-1108-0049
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

- Furthermore, in addition to the Habitat Suitability Assessment Report, which indicates records of threatened/engendered species and/or their habitat associated with onshore components, EPA recommends conducting surveys to determine site-specific conditions that can better inform the impacts analysis in the EIS.

A.3.13.1. Onshore Noise and vibration

Comment Number: BOEM-2024-0008-0004-0009
Commenter Type: Individual
Commenter: Noel Quinn

Comment Excerpt Text:

To date the scientific community hasn't concluded if Wind turbine syndrome exists or defined an unsafe distance to live near wind turbines.

However, Wind Turbine Syndrome, has been reported by many people who live near industrial wind turbines.

Whether or not exposure can result in an array of symptoms and disorders has been widely debated.

It has been reported that noise from wind turbines can lead to symptoms such as dizziness, nausea, ear pressure, tinnitus, hearing loss, sleeping disorders, headache and other symptoms.

While wind turbines are generally quiet, some people are extremely sensitive to noise, particularly low-frequency sounds.

Comment Number: BOEM-2024-0008-0138-0005
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

The COP fails to demonstrate that the audible and infrasonic noise to persons at the shore is not expected from turbine operation, exceeding the New Jersey night time residential standard of 50 decibels.

Comment Number: BOEM-2024-0008-0611-0031
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

The EIS needs to provide a quantitative assessment of airborne noise levels at the shore for both turbine operation of the full wind complex (North and South) and from pile driving. Our analysis of such levels for turbine operation, confirmed by an expert acoustic company indicates that the noise levels at the shore from turbine operation will be just below the night time residential standard of 50 decibels. However, the modeling used did not account for air temperature and wind speed inversion conditions, which occur

frequently off New Jersey, and which would increase the noise levels received at the shore. Under those conditions, standards will likely be exceeded. In addition, the noise source level from pile driving is greater than that from operational noise so it is likely that the pile driving noise will exceed standards at the shore.

Comment Number: BOEM-2024-0008-0611-0032
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

The treatment of onshore noise from offshore activities (Appendix II - V Onshore Noise Report section 9.0 Onshore Noise from Offshore Activities) is deficient. While sound assessments are done for onshore noise from onshore sources, not such assessment is done for onshore noise from offshore activities. There is a blanket statement that sound from operating turbines will be below 50 dBA at a distance of 1000ft and references a NYERDA report from 2013. The referenced does report values but for single turbines of much smaller size (1.5 and 2.3 MW). For the Atlantic Shores North project alone there will be 157 15 mw gearbox turbines. It is well documented, including in the referenced NYERDA study that larger turbines are substantially noisier. The referenced numbers also were for land based turbines, these will be in the ocean which is subject to inversions that channel the sound. There is also no treatment of the impact of pile driving noise which is likely to be even higher than that from operational noise.

Comment Number: BOEM-2024-0008-0627-0001
Commenter Type: Individual
Commenter: Steven Ullmer

Comment Excerpt Text:

Other than all the various evidence that offshore wind is a very stupid idea, have you also considered the "wake effect" thousands of offshore wind turbines will create? It is known that this can reduce power output of downwind turbines. Considering these monstrous edifices can so effect wind patterns, have you considered the possible disruption of weather patterns? Could over 3000 offshore wind turbines off the NJ shore adversely cause drought or flooding? Will this venture cause not only marine death, but death to human populations?

Comment Number: BOEM-2024-0008-0962-0002
Commenter Type: Individual
Commenter: Barbara Sommer

Comment Excerpt Text:

What about noise levels to local residents? As LBI is only 1/2 mile wide at its widest point, with turbines just 8 mi out, any noise will be heard from one side of the island to the other. Can you address this concern? What about our local noise ordinances? Are you in compliance?

Comment Number: BOEM-2024-0008-0999-0002
Commenter Type: Individual
Commenter: Alissa Kanowitz

Comment Excerpt Text:

As someone who is very sensitive to vibration, I fear that the island will be uninhabitable for many people and pets due to the infrasound associated with the turbines.

Comment Number: BOEM-2024-0008-1040-0005
Commenter Type: Individual
Commenter: Denise Boccia

Comment Excerpt Text:

Why hasn't the BOEM done a numerical estimate for the noise coming from these large turbines?

Comment Number: BOEM-2024-0008-1088-0004
Commenter Type: Individual
Commenter: Mary O'Keeffe

Comment Excerpt Text:

Additionally the noise from the turbines being so close to the shore will be audible and even exceed the allowed NJ State nighttime noise standards.

Comment Number: BOEM-2024-0008-1110-0002
Commenter Type: Local Government
Organization: Berkeley Township

Comment Excerpt Text:

Medical studies are replete identifying both human and animal health risks associated with sustained low frequency nose. LFN is a by-product of wind turbines. Numerous studies have focused on the wind turbine biological effect, a critical review of the determination regarding wind turbine in New Jersey is necessary. Consistent with today's practice, promoting one viewpoint reliance on a self-serving beneficial study while ignoring an opposing one should be rejected in favor of an educated determination.

Comment Number: BOEM-2024-0008-1110-0003
Commenter Type: Local Government
Organization: Berkeley Township

Comment Excerpt Text:

Plos One concluded, in pertinent part, "At present it seems reasonable to conclude that noise from wind turbines increases the risk of annoyance and disturbed sleep-in exposed subjects tina dose response relationship .... It therefore seems reasonable to conclude that a cautious approach is needed when planning future wind farms."

Comment Number: BOEM-2024-0008-1110-0004
Commenter Type: Local Government
Organization: Berkeley Township

Comment Excerpt Text:

Plos One demonstrated a real attempt to separate bias results. Beyond any study, common sense recognizes the health effect of noise pollution (i.e. Apple phone/watches have a noise measurement device identifying healthy and unhealthy noise levels, New York City decibel level, parents routinely admonishing their children turn down the radio, television, and stereo to safeguard hearing, the United State use of loud continuous noise during Operation Just Cause to force Noriega's surrender, the use of loud noise and resulting sleep deprivation in Afghanistan to obtain information from Taliban combatants, etc.) SEE ATTACHMENT 5. [Neither this response, Berkeley Township nor the author/respondent condones torture or any of the methods referenced in this response. The sole purpose is to highlight the terrible effect noise has on all forms of life, which must be avoided]. While distance mitigates the negative health effect noise it does not eliminate it (i.e., Hearing loss and health effect experienced by soldiers, airline mechanics, aviators, wind turbine employees, sea life, etc.). Human and animal life, within the proximity of the turbines may well suffer devastating emotional and physical trauma. Whales' studies suggest a negative effect secondary to Wind Turbines. While distance may provide insulation of direct wind turbine effect; the New Jersey Shore population and critical fishing industry will be indirectly, but substantially affected. All alternatives must be explored.

Comment Number: BOEM-2024-0008-1200-0001
Commenter Type: Individual
Commenter: John Deputato

Comment Excerpt Text:

You better be smarter, more skillful and more responsible. Have these size turbines actually been tested or been proven to be in full operation for any length of time and what type of acoustics will they produce both under and on top of the ocean? Can they be heard from shore?

The data that I have seen from real acoustic experts like Robert Rand show that we will hear these turbines from the shore. Are you prepared for this island to lose its main source of income and put thousands of people and family owned businesses out of work.

A.3.13.2. Materials management

Comment Number: BOEM-2024-0008-0068-0005
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

Another detrimental aspect of the proposed wind farms relates to decommissioning. To my knowledge, the developers are only required to decommission the wind farms at the end of their useful life. Close them up and walk away. As a practical matter, that means the wind turbines will always remain.

Even if developers were required to remove the structures, it is not technically feasible.
-how would foundations be cut below the sea bed?
-to remove the structures, specially equipped {for wind turbines) U.S. (due to Jones Act) vessels are in short supply. Why would a developer use them for turbine removal (costing them money) rather than for building new turbines somewhere else (making them money)?

-even if the turbine structures were removed by appropriate vessels, where is the infrastructure that would be required to cut up the structure, recycle or otherwise dispose of it? Dumping your old car? There are junk yards available to crush it into a cube. Nothing comparable for huge wind turbines.

Comment Number: BOEM-2024-0008-0483-0001
Commenter Type: Individual
Commenter: Trina Garrett

Comment Excerpt Text:

Turning our oceans into industrial jungles of concrete, steel , metal , electrical wires, electrical stations,. Wind turbines work less than half the time so more stations will need to be built to store the power. The huge blades are not recyclable. They need to be replaced every 2 to 3 years and they will end up in land fills across America.

Comment Number: BOEM-2024-0008-0558-0003
Commenter Type: Individual
Commenter: Tony Moutinho

Comment Excerpt Text:

The post construction from the hot water used to cool the transfer stations, the interference from the electric running through the cables and the potential (actually realistic) leaking of oil from the turbines and Safety risk to recreational and commercial fisherman cannot be denied.

Comment Number: BOEM-2024-0008-0581-0004
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

4. The needed replacement parts to be constant and the ability to recycle these parts is not possible and takes up lan space with burying blades etc.

Comment Number: BOEM-2024-0008-0587-0004
Commenter Type: Individual
Commenter: Eryn Topper

Comment Excerpt Text:

What is the plan to decommission the turbines?

Comment Number: BOEM-2024-0008-0640-0004
Commenter Type: Individual
Commenter: Anne Baker

Comment Excerpt Text:

We have yet to hear how these monsters will hold up in hurricane winds over time, or even once.

So now..how are they removed once they're no longer working. Will you then bury them in an ocean

graveyard?

Comment Number: BOEM-2024-0008-0645-0006
Commenter Type: Individual
Commenter: Patrice Tullai

Comment Excerpt Text:

Wind turbines are not everlasting. The average wind turbine, and not all are average, last

20 years, and at that point most parts are not recycled. They are also classified as toxic waste. In 2017 Germany was left with 1.35 million tons of wind turbine blades. Can you imagine how many tons of these blades there are now? Germany has been in the forefront of "green energy". If "green energy" is clean and sustainable why is it now they have resorted back to coal after oil has been sanctioned?

Comment Number: BOEM-2024-0008-0645-0007
Commenter Type: Individual
Commenter: Patrice Tullai

Comment Excerpt Text:

Steel and Concrete

By mass the main ingredients used in wind turbines are steel and concrete. The most critical is steel. Each new MW of wind power requires 120-180 tons of steel. Steel is also required for other phases in the generation of wind power, from the machines that extract the ore that will become the steel for the wind turbine, to the cranes that lift and install the turbines, to the trains and trucks that transport them.

Iron ore is the beginning of steel and is mined all over the world. The largest mines are in Brazil in the Amazon Rain Forest. Forests around Carajas are cut for charcoal to fuel pig iron plants resulting in an annual deforestation of 3,800 plus square miles.

Mining steel leaves behind a toxic sludge called "tailings", which make poisoned waters, killing fish and food sources. There have been instances where these tailing reservoirs have collapsed and sent their demise into hundreds of rivers.

Comment Number: BOEM-2024-0008-0645-0009
Commenter Type: Individual
Commenter: Patrice Tullai

Comment Excerpt Text:

74 percent of wind turbines mass is in the foundation. Hidden from view, below the ground or waters are massive concrete foundations that keep the wind turbine towers upright.

Concrete and rebar are used in these foundations. How much rebar? Excavate 10 feet deep 100 feet wide, set 96,000 pounds of reinforcing steel rebar = 48 tons. These figures multiply when installing off shore. These are vast amounts of material and energy required and have to be replaced all over again in 20 years (and just 15 if offshore). For comparison an average house weights from 72 to 104 tons. So a 2 MW turbine weights as much as 23 homes. The offshore wind turbine Haliade-X is 12 MW. This would weight as much as 138 homes.

Sand is a key ingredient in all concrete. Sand is the second most used global resource behind water. The world uses 500 billion metric tons of sand annually, enough to build an 88 foot tall 88 foot wide wall

around the world. We are ripping up forests and farmlands just to get to more sand. There are already ongoing reports of a mafia-style black-market for sand.

Comment Number: BOEM-2024-0008-0658-0002
Commenter Type: Individual
Commenter: Darlene Mayser

Comment Excerpt Text:

Understanding that sustainable energy is needed, there need to be alternatives to this. What will happen when non recyclable blades of the wind turbines fail? Will they be dumped into the ocean?

Comment Number: BOEM-2024-0008-0778-0003
Commenter Type: Individual
Commenter: Prof. Edgar Gunter

Comment Excerpt Text:

There are an incredible number of environmental problems generated by wind turbines on Marine life, and the leakage of highly toxic lubricating oils for the turbines.

Comment Number: BOEM-2024-0008-0789-0004
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

They also REQUIRE oil-run generators to operate. Not to mention what it takes and what materials are used to produce these monstrosities, and they are NOT recyclable. There are out of commission blades already piled in landfills.

Comment Number: BOEM-2024-0008-0789-0006
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

All for industrial monstrosities that will be defunct in 20years, piled up in landfills, or worse.

Comment Number: BOEM-2024-0008-0808-0004
Commenter Type: Individual
Commenter: Dennis De Forest

Comment Excerpt Text:

Leaking oil: There are legitimate concerns about potential oil leaks from the turbines.while proponents argue that modern turbines use minimal lubricants any risk of contamination should be taken seriously.

Comment Number: BOEM-2024-0008-0861-0004
Commenter Type: Individual
Commenter: Suzanne Bibbo

Comment Excerpt Text:

The turbines themselves are a future environmental disaster. There is nothing beneficial about offshore wind.

Comment Number: BOEM-2024-0008-0861-0006
Commenter Type: Individual
Commenter: Suzanne Bibbo

Comment Excerpt Text:

What happens when these turbines need to be decommissioned? I have never felt more strongly about an issue in my life. The ocean is a precious natural resource that belongs to all of us, no one should have the right to cause this destruction.

Comment Number: BOEM-2024-0008-0879-0001
Commenter Type: Individual
Commenter: Fran Szymanek

Comment Excerpt Text:

Large trucks bring steel and other raw materials to the site, earth-moving equipment beats a path to otherwise inaccessible high ground, large cranes erect the structures, and all these machines burn diesel fuel. So do the freight trains and cargo ships that convey the materials needed for the production of cement, steel, and plastics. For a 5-megawatt turbine, the steel alone averages [pdf] 150 metric tons for the reinforced concrete foundations, 250 metric tons for the rotor hubs and nacelles (which house the gearbox and generator), and 500 metric tons for the towers.

If wind-generated electricity were to supply 25 percent of global demand by 2030 (forecast [pdf] to reach about 30 petawatt-hours), then even with a high average capacity factor of 35 percent, the aggregate installed wind power of about 2.5 terawatts would require roughly 450 million metric tons of steel. And that's without counting the metal for towers, wires, and transformers for the new high-voltage transmission links that would be needed to connect it all to the grid.

A lot of energy goes into making steel. Sintered or pelletized iron ore is smelted in blast furnaces, charged with coke made from coal, and receives infusions of powdered coal and natural gas. Pig iron is decarbonized in basic oxygen furnaces. Then steel goes through continuous casting processes (which turn molten steel directly into the rough shape of the final product). Steel used in turbine construction embodies typically about 35 gigajoules per metric ton.

To make the steel required for wind turbines that might operate by 2030, you'd need fossil fuels equivalent to more than 600 million metric tons of coal.

A 5-MW turbine has three roughly 60-meter-long airfoils, each weighing about 15 metric tons. They have light balsa or foam cores and outer laminations made mostly from glass-fiber-reinforced epoxy or polyester resins. The glass is made by melting silicon dioxide and other mineral oxides in furnaces fired by natural gas. The resins begin with ethylene derived from light hydrocarbons, most commonly the products of naphtha cracking, liquefied petroleum gas, or the ethane in natural gas.

The final fiber-reinforced composite embodies on the order of 170 GJ/t. Therefore, to get 2.5 TW of

installed wind power by 2030, we would need an aggregate rotor mass of about 23 million metric tons, incorporating the equivalent of about 90 million metric tons of crude oil. And when all is in place, the entire structure must be waterproofed with resins whose synthesis starts with ethylene. Another required oil product is lubricant, for the turbine gearboxes, which has to be changed periodically during the machine's two-decade lifetime.

Undoubtedly, a well-sited and well-built wind turbine would generate as much energy as it embodies in less than a year. However, all of it will be in the form of intermittent electricitywhile its production, installation, and maintenance remain critically dependent on specific fossil energies. Moreover, for most of these energiescoke for iron-ore smelting, coal and petroleum coke to fuel cement kilns, naphtha and natural gas as feedstock and fuel for the synthesis of plastics and the making of fiberglass, diesel fuel for ships, trucks, and construction machinery, lubricants for gearboxeswe have no nonfossil substitutes that would be readily available on the requisite large commercial scales.

Comment Number: BOEM-2024-0008-0879-0002
Commenter Type: Individual
Commenter: Fran Szymanek

Comment Excerpt Text:

Who is going to service these wind turbines and remove them safely and carefully from the ocean/ocean bed when they break in a hurricane or expire? I haven't heard anything about this part of the plan. Are there contracts with some company to come and carefully remove/extract the old or broken 12-26 ton blades? The life expectancy is 25 years at best. Will this lead to the ocean floor becoming a dumping ground further polluting the ocean and affecting the precious (now healthy) biomes of the East Coast?

Comment Number: BOEM-2024-0008-0964-0007
Commenter Type: Individual
Commenter: Sally Barbato

Comment Excerpt Text:

The NJ governor stated on 12NJ that there is no plan for disassembling at the end of the turbines lifetime. Who will fund the disassembly and what will be able to be removed.? The rocks at the base of the turbines will have already destroyed the bottom sand-base so what will happen with those bases? What will happen with the miles and miles of old cables? Who has the skills to take these things out and down without destroying whatever sea life may be left?

Comment Number: BOEM-2024-0008-1029-0003
Commenter Type: Individual
Commenter: Douglas Crawford

Comment Excerpt Text:

BOEM has ignored the risks associated with the fluids and chemicals/gases (SF6) contained in offshore installations. The infographic below calculates all of the industrial fluids in the current U.S. offshore plans. Prior estimates for just the New Jersey 7500MW plan and 1100MW plan are 25 million gallons/2.5 million pounds of SF6 and 35 million gallons/5 million pounds of SF6 respectively. Creating such a risk, which could become a nightmare on the East Coast in catastrophic storms or acts of war, should be avoided. Relatedly, the plans that would be implemented in the case of catastrophic spills are classified, and therefore cannot be judged by the public. The public should know the completeness of

the cleanup plans.

Comment Number: BOEM-2024-0008-1029-0006
Commenter Type: Individual
Commenter: Douglas Crawford

Comment Excerpt Text:

Poisoning of the fish in the vicinity: You do not forbid the use of sacrificial anodes as a method of protecting the undersea steel structures. So, the builders will use them as the cheapest solution. We aren't supposed to use hot water from hot water tank heaters in our homes for cooking due to the sacrificial anodes contained within, as they leach heavy metals into the water, making it unsafe to consume.

Sacrificial anodes have been used on oil rigs and boats for a long time. There has already been sensing of the heavy metal content in the North Sea from sacrificial anodes. Now, New Jersey, the East Coast, and all of the coastal US have plans to fill the near-shore waters with an explosion of structures likely using sacrificial anodes - significantly increasing the concentration of leached heavy metals.

Comment Number: BOEM-2024-0008-1029-0007
Commenter Type: Individual
Commenter: Douglas Crawford

Comment Excerpt Text:

Heavy metal content in our seafood is already a concern tarnishing the joy of eating seafood. Offshore wind installations are going to increase this threat to our seafood products from the near shores. (If our fishermen are even going to be able to operate with all the best fishing lands being inaccessible, which we believe they will not).

Any claim that the turbine bases will be fine fish habitat is absolute nonsense. We will not want to eat fish caught anywhere near the turbines, and you can forget about mitigating the loss of commercial fishing catches by establishing fish farms in the wind farm lease areas.

Here are some sea-ready offshore wind bases laced with sacrificial anodes. I was able to spot a few; see if you can locate them below:

[See original attachment for photo]

BOEM should be concerned about this, and calculate the concentrations of heavy metals that will be leached into a wind farm area and tell the truth about the abortion into creatures creatures living there and the probably concentration into our seafood.

Comment Number: BOEM-2024-0008-1050-0003
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

The project will not help fight climate change, as stated in BOEM's official document, poses a risk with thousands of gallons of various lubricants and other hazardous materials, which will be potentially released into the environment when a serious hurricane hits the area, which is inevitable.

Comment Number: BOEM-2024-0008-1095-0003
Commenter Type: Individual
Commenter: Michael Mason

Comment Excerpt Text:

The windmills leak, generate heat, noise/frequencies, they will rust, break apart into the water etc. the lifespan is only 15 years. The purpose will not be suffice for the energy they need to generate. The damage outweighs the reward. The blades are not recyclable, they're buried out in the desert which causes more concern for pollution. Windmills are pollution to put it simply. The current windmills on land that are damaged cannot afford to be fixed so there are a degrading eye sore that have no purpose. Also no wind= no energy. Aren't we learning anything from Ev's? They're not the answer. Short term ideas leave long term damage on the environment/wildlife, sea life.

Comment Number: BOEM-2024-0008-1106-0045
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

- Impacts of chemical emissions (including the release of chemical residues from wind farm operating materials and corrosion protection systems);

Comment Number: BOEM-2024-0008-1108-0002
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

Hazards
- EPA recommends the EIS describe the Ocean Disposal Sites which may be located near the export cable corridors (Historical Area Remediation Site US204; Shark River, NJ Dredged Material Disposal Site US101; Manasquan, NJ Dredged Material Disposal Site US096)
- EPA recommends the EIS include relevant distances from the sites, what protections are in place to ensure the sites are not disturbed and describe the potential impacts to the sites.

Comment Number: BOEM-2024-0008-1111-0014
Commenter Type: Advocacy Group
Commenter: Jack Fullmer
Organization: New Jersey Council of Divers and Clubs

Comment Excerpt Text:

Regarding pollution, there will be pollution during construction and after construction. During construction, the massive building of 157 wind turbines, each nearly 900 ft tall structures and associated construction barges and support vessels will lead to inevitable pollution and siltation. The probability of collisions is at an increased level due to the number of vessels involved. After construction, each wind turbine will have large quantities of grease, hydraulic oil, gear oil, dielectric fluid. diesel fuel, propylene and ethylene glycol that have to be transferred and changed at regular intervals with inevitable spills. The substations within the wind turbine area will have huge quantities of transformer oil, diesel fuel, and hydraulic oil. Could a Category 4 or 5 hurricane knock out a number of wind turbines or substations

causing a major pollution problem. NJ depends on clean water for it's shoreline and tourists industry!

Comment Number: BOEM-2024-0008-1138-0004
Commenter Type: Individual
Commenter: Kathleen Harper

Comment Excerpt Text:

They say they are going to last 20 years but some of them they are finding only last ten to 15 years. And when they come into to decommission them, they say they are recyclable, but they are not all recyclable. The worst thing you are going to find the blades end up in landfills, and they have chemicals in them and they will effect the ground water of where the landfills are.

Comment Number: BOEM-2024-0008-1139-0001
Commenter Type: Individual
Commenter: Patricia Brennan

Comment Excerpt Text:

And if you look at the history of where the other turbines are, whether they are in the water or on land, they show they are leaking diesel fuels and I can't remember the other name of the toxic chemical they have got in them, but I have read that environmental impact statement, I don't see a plan to maintain them, and service them and decommission them.

Comment Number: BOEM-2024-0008-1139-0003
Commenter Type: Individual
Commenter: Patricia Brennan

Comment Excerpt Text:

At the base of the turbines, they will be dumping out is 1,000 gallons of heated carbonated water, and how those close these things are, you know, I don't want to be swimming in 90 degree water. It even shows in the BOEM impact study that it will affect the temperature of the land because they will be blocking the wind, shows they don't withstand Nor Easters or categories, category hurricanes over a two.

Comment Number: BOEM-2024-0008-1172-0001
Commenter Type: Advocacy Group
Commenter: Carl Van Warmerdam
Organization: Deep Sea Defenders

Comment Excerpt Text:

So these projects, you call them renewable but they are not, they are rebuildable. 30 years down the road, they will have to be rebuilt again and the mining and the minerals and the manufacturing will have to restart all over again.

Comment Number: BOEM-2024-0008-1172-0005
Commenter Type: Advocacy Group
Commenter: Carl Van Warmerdam
Organization: Deep Sea Defenders

Comment Excerpt Text:

Another thing that isn't included in the wind turbines is because it's a nondispatchable energy source, it requires batteries. So I see no reckoning in the COP for the battery storage because this is intermittent energy, so there is -- that's not placed in the figures there. Where is all -- where is all this battery storage going to go? It's not base load. It's -- that's -- so we are going to have all this energy flowing in and it's not on demand, it's when the energy blows, but when it stops, people want their energy. So that's how our energy system is based, so these -- now you are putting the cart before the horse and it's doomed to failure.

A.3.14 Marine Mammals

Comment Number: BOEM-2024-0008-0005-0003
Commenter Type: Individual
Commenter: James Binder

Comment Excerpt Text:

There still has not been a definitive study done or specific evidence presented by BOEM or NMFS as to why the whales are washing ashore in NJ and along the East Coast, coincident with geophysical testing being conducted offshore by the wind companies. General statements by BOEM and NMFS saying that there is no evidence for linking the whale deaths to offshore wind activity are not convincing, nor justifiable from a scientific basis. Please provide the evidence and specific studies justifying your position. Please explain how you can approve these projects, as BOEM and NMFS publicly recognize, that not one north American right whale can die as a result of the development, construction and operation of the windmills w/o threatening the extinction of this mammal. This is not a situation to be mitigated, it is one to be avoided.
4. As a current lawsuit states, the North American Right Whale migrates and feeds along the entire East Coast from Maine to Georgia, yet neither BOEM nor NMFS has conducted a cumulative impact analysis on this species of the impact of all the wind mill projects either already approved by BOEM or planned in leasing actions on this species. Please conduct such a cumulative impact analysis.

Comment Number: BOEM-2024-0008-0007-0003
Commenter Type: Individual
Commenter: Diane Snelson

Comment Excerpt Text:

The UNPRECEDED number of whale deaths that have washed-up in the New Jersey/New York coastal areas is also alarming. The only unique factor from previous years, is the excessive scope, scale, and magnitude of offshore wind powerplant activity/surveying in the region. Because the underwater noise from all phases of project development; vessel surveys, pile driving for construction, and operation of these new, larger turbines poses severe risks to marine mammals. BOEM also anticipates that the cumulative impacts of these activities would result in major impacts on commercial and for-hire recreational fisheries in the geographic analysis area as well.

Comment Number: BOEM-2024-0008-0062-0001
Commenter Type: State/Local Elected Official
Organization: New Jersey's 9th Legislative District Delegation

Comment Excerpt Text:

First, our delegation vehemently opposes the placement of offshore wind turbines in view of the likely irreparable damage caused to the environment, including fragile marine wildlife habitats. Many rightfully reject the argument that the drilling into the ocean floor necessary to place these massive structures will not have profound ecological repercussions, including the death of marine wildlife and the disruption of migratory patterns of impacted species.

Comment Number: BOEM-2024-0008-0069-0001
Commenter Type: Individual
Commenter: Virginia Murray

Comment Excerpt Text:

As a homeowner on LBI, I am opposed to locating ANY wind turbines off the New Jersey coastline. Proposed wind turbines have been located directly in the migration path of the North Atlantic Right Whale, of which there are only ~350 surviving. A new report has just been issued correlating large whale mortality and offshore wind development activity. Government agencies which try to tell us that OSW is not responsible for these deaths think we, the people, are stupid. We are not.

Comment Number: BOEM-2024-0008-0071-0002
Commenter Type: Individual
Commenter: Doreen Pavese

Comment Excerpt Text:

Please reconsider. Our wildlife is already washing up dead. I can only imagine the horrendous effect this project will have on them.

Comment Number: BOEM-2024-0008-0081-0005
Commenter Type: Individual
Commenter: Patrick Cozza

Comment Excerpt Text:

There is still non conclusive evidence that marine life, particularly whales, will not be harmed with the redirected flow of ocean traffic.

Comment Number: BOEM-2024-0008-0125-0001
Commenter Type: Individual
Commenter: Joe Ferrandino

Comment Excerpt Text:

Why are the save the whales activist and PETA silent?

Comment Number: BOEM-2024-0008-0138-0022
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

The most pressing issue surrounding the ASOWNJ project and BOEM's entire offshore wind energy program along the eastern seaboard, is the project-specific and cumulative impacts on the federally-endangered North Atlantic right whale (NARW), which is generally considered the most imperiled marine mammal native to North America. Indeed, the total NARW population rests at approximately 330 individuals, and that number is dropping due to constant human-caused mortality, low calving rates, highly extended calving intervals, loss of prey species and access to foraging habitat, low and diminishing physical fitness, lack of genetic diversity, and extreme low abundance of reproductive females. Most whale experts agree that unless human-caused mortalities are immediately curtailed to zero, the NARW will become extinct in the next 30 to 60 years. For these reasons, it is imperative that the offshore wind developer and BOEM, through its future DEIS, examine closely, carefully, and comprehensively the ASOWNJ project's potential to adversely affect NARW and exacerbate existing threats to the species. Unfortunately, the COP fails this basic task, leaving many impacts undisclosed, unstudied, and unmitigated.

Comment Number: BOEM-2024-0008-0138-0023
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

An accurate or adequate accounting of the number of NARW within the project area, which includes all transit corridors for vessels traveling between the wind development area (WDA) and supply ports.

Comment Number: BOEM-2024-0008-0138-0025
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

An accurate or adequate projection of the number of miles the various project vessels will travel through NARW habitat during construction, operation, and decommissioning of the project.

Comment Number: BOEM-2024-0008-0138-0026
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

Use of the best available commercial and scientific data to establish baseline environmental conditions within the project area. THE EIS must provide a sufficient assessment of the project area's role in NARW migration, foraging, mating, calving, and other life history stages. The EIS must provide information on the existence, location, abundance, and aggregation of zooplankton in the project area. This is a critical information deficit, given that NARW feed exclusively on zooplankton.

Comment Number: BOEM-2024-0008-0138-0027
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

Sufficient information on the current and anticipated use of the areas near the project site by non-project vessels. This information is necessary to assess the risk of NARWs being hit by vessels or entangled in fishing gear as a result of being pushed out of the project site by pile driving noise. In fact, the EIS must assess all risks and impacts to NARW resulting from displacement caused by project-related noise, both construction and operational. This includes loss of preferred foraging areas, loss of preferred migratory corridors, increased energy demands to find food or to migrate, increased risk of predation, increased risk of vessel strikes, increased entanglement in fishing gear, and overall loss of body fitness.

Comment Number: BOEM-2024-0008-0138-0028
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

An incomplete discussion of the current imperiled status of the NARW. For example, it does not adequately address the NARW's sharply declining population, its low calving rate, the continued loss of reproductive females, and its ever decreasing PBR (potential biological removal) rate.

Comment Number: BOEM-2024-0008-0138-0029
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

An adequate analysis of pile driving noise on NARW, and uses a noise dispersion/attenuation model that deviates substantially from industry standard without explaining the justification for this decision.

Comment Number: BOEM-2024-0008-0138-0030
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

A critical assessment of the proposed measures for protecting NARW from pile driving noise. Prior DEIS documents assumed without analysis that Protected Species Observers (PSOs), along with data from passive acoustic monitory (PAM) equipment, will enable the applicant to detect each and every NARW that may enter the pile driving Level A harassment zone.1 There is no evidence to support this assumption. PSOs can only see whales on the surface of the water, not at depth. In addition, they cannot see beyond 1,500 meters in any direction. This distance is further diminished during times of poor lighting, rough seas, heavy swells, or fog. PAM systems only detect whales that are actively vocalizing; no-vocalizing whales will not be picked up at all. Baleen whales, including NARWs, are among the least vocal whales in the Atlantic Ocean, often going days, even weeks, without uttering a sound. Further PAM systems have a significant "miss rate" which results in many marine mammals going undetected. 2 This fact is not discussed in prior DEIS documents, even though it bears directly on the efficacy of the mitigation measures and strategies that BOEM believes will protect the whale from project-related impacts. Note that the above-noted limitations on PSOs and PAM systems also apply to their ability to

protect whales from project-related vessel strikes.

Comment Number: BOEM-2024-0008-0138-0031
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

Adequate analysis of operational noise impacts on NARW. The ASOWNJ project will install and operate hundreds of large wind turbines. The noise impacts from such a huge array of large turbines have never been studied. In fact, the only field studies conducted on the issue involved five 6MW turbines off Block Island, RI. The noise signature of the Block Island wind farm simply cannot be compared to the noise signature that will be created by the industrial-scale ASOWNJ project. In addition, the previous EIS's operational noise analysis use sound propagation and attenuation model inputs that are not supported by the best available science and deviate substantially from industry practice, leading to a gross underreporting of the Project's noise impacts.

Comment Number: BOEM-2024-0008-0138-0032
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

Adequate assessment of the project's potential to alter water currents and stratification. This issue was raised in a letter, dated May 13, 2022, by Sean Hayes, PhD, of NOAA Fisheries to BOEM. According to Dr. Hayes, the long-term effects of altered stratification will likely affect the aggregation of zooplankton, causing the zooplankton to disperse. This is problematic, given that NARW can efficiently feed on zooplankton only when the zooplankton are aggregated in dense patches.

Comment Number: BOEM-2024-0008-0138-0033
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

Adequately assess the how the ASOWNJ project, plus the other offshore wind energy projects slated for construction within NARW habitat, will affect the species cumulatively, especially when the total offshore wind impacts added to the stressors that already threaten the species (e.g., commercial vessel traffic).

Comment Number: BOEM-2024-0008-0155-0003
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

with the damage this is doing from sonar blast and the vibrations and the sounds is detromental to the engaged whales who have been lost and the other sea life.

Comment Number: BOEM-2024-0008-0409-0002
Commenter Type: Individual
Commenter: Brian Russo

Comment Excerpt Text:

We know there is no correlation between the development of offshore wind and the death of dolphins and whales.

Comment Number: BOEM-2024-0008-0434-0002
Commenter Type: Individual
Commenter: Richard Van Fleet

Comment Excerpt Text:

There has been a meeting by BOHM on LBI, the very island it will impact the most
Blasting in the ocean has been killing whales, that have washed up on our shores. If this were a pipeline, the project would have never made it as far as it has, given the destruction it's causing.

Comment Number: BOEM-2024-0008-0457-0002
Commenter Type: Individual
Commenter: Lawrence Cutalo

Comment Excerpt Text:

The area is regularly used as amigratory channel by five species of whales, including the critically endangered North Atlantic right whale.

Comment Number: BOEM-2024-0008-0483-0003
Commenter Type: Individual
Commenter: Trina Garrett

Comment Excerpt Text:

Wind turbines in our oceans are killing whales, dolphins, turtles, fish, and other sea life.

Comment Number: BOEM-2024-0008-0485-0004
Commenter Type: Individual
Commenter: E. Robb

Comment Excerpt Text:

The impact on marine wildlife could be devastating

Comment Number: BOEM-2024-0008-0517-0001
Commenter Type: Individual
Commenter: Donna Lafleur

Comment Excerpt Text:

I oppose the industrialization of the Atlantic Ocean for many reasons. First I have seen the reports of so many dead whales showing up and down the Eastern seaboard. The North Atlantic Right Whale

population is nearly extinct at this point. To continue pounding the ocean bed to construct these monstrosities in my opinion is going to do irreversible damage to the NA Right Whales as well as other species.

Comment Number: BOEM-2024-0008-0524-0005
Commenter Type: Individual
Commenter: Sharon Mahoney

Comment Excerpt Text:

Federal agencies responsible for protecting our ocean environment and marine mammals MUST justify their approvals of the placement of the turbines by using scientific measures that assure the public that their decisions will benefit the environment and sea life- it is not enough evidence for BEOM to simply state on this virtual meeting that is has been evaluated.

Comment Number: BOEM-2024-0008-0526-0004
Commenter Type: Individual
Commenter: Darlene Holden

Comment Excerpt Text:

Please do not allow this OSW project take place. It will destroy our ocean and cause the loss of ocean life to our whales, dolphins which we saw during the surveying last winter, in NJ. We are now watching our mammals wash ashore in New England, since their start of OSW.

Comment Number: BOEM-2024-0008-0538-0003
Commenter Type: Individual
Commenter: Mary Smith

Comment Excerpt Text:

The horrors to nature and the exorbitant costs for these fuel laden projects are not acceptable to me and my family. I do not want to continue be told all deaths of whales and dolphins are vessel strikes when unbiased necropsies cannot be done and those that are being done are not completed.

Comment Number: BOEM-2024-0008-0539-0001
Commenter Type: Individual
Commenter: Trudy Getler

Comment Excerpt Text:

Please stop. If you allow these wind farm to be built you will be continuing the murder of every species in the ocean. Look at the Destruction and devastation you're doing north of us and south of us. Look at what's being done in Massachusetts, 5 dead whales in one week! Look what is happening from Virginia Beach to OBX I believe it's now nine whales the past month.

Comment Number: BOEM-2024-0008-0544-0002
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

Just the testing alone is decimating our marine mammal populations and pushing the endangered North Atlantic Right Whale population towards extinction.

Comment Number: BOEM-2024-0008-0549-0001
Commenter Type: Individual
Commenter: William Graham

Comment Excerpt Text:

It's time to STOP and assess the damage being done to the cetaceans. No one is fooled by the necropsy reorts created by wind funded NGO's. It's time to do your jobs and follow the requirements of the take permits and protect the whales.

Comment Number: BOEM-2024-0008-0558-0002
Commenter Type: Individual
Commenter: Tony Moutinho

Comment Excerpt Text:

The damage from construction (pounding the pipes into the ocean floor, digging trenches to bury cables) will certainly kill wildlife (thats why the company's asked for "Takes"). The damage and death to sea life from construction will be not be able to be repaired. For years, we have been trying to protect the whales, clams, fish, scallops and now this project will reverse all that hard work.

Comment Number: BOEM-2024-0008-0558-0006
Commenter Type: Individual
Commenter: Tony Moutinho

Comment Excerpt Text:

You will kill sea life

Comment Number: BOEM-2024-0008-0562-0004
Commenter Type: Individual
Commenter: James Ulrich

Comment Excerpt Text:

Additionally, offshore wind farms pose a significant threat to marine life, particularly whales and dolphins. The construction and operation of turbines can lead to underwater noise pollution, which has been shown to disturb marine mammals' communication, feeding, and migration patterns.

Comment Number: BOEM-2024-0008-0564-0003
Commenter Type: Individual
Commenter: Jane Cagney

Comment Excerpt Text:

You will cause the extinction of the NARW, if you haven't already. Scientists have determined that the loss of just one breeding female will cause ultimate extinction.

Comment Number: BOEM-2024-0008-0567-0004
Commenter Type: Individual
Commenter: Maryanne Klemmer

Comment Excerpt Text:

It is public knowledge that the offshore wind survey activities in NJ from Dec. 2022 to Dec. 2023 correlated with the death of 31 whales and 67 dolphins. Eye witnesses saw the dolphins beach themselves in Sea Isle, NJ as the surveying was in process.

Comment Number: BOEM-2024-0008-0574-0001
Commenter Type: Individual
Commenter: George Thayer

Comment Excerpt Text:

This proposed project is an affront to the environment and to LBI. The damage that the sonar has already caused to the whales,

Comment Number: BOEM-2024-0008-0578-0001
Commenter Type: Individual
Commenter: Capt Todd MacGregor

Comment Excerpt Text:

How many more Whales need to be killed by OSW?

Comment Number: BOEM-2024-0008-0586-0001
Commenter Type: Individual
Commenter: Theresa Teti

Comment Excerpt Text:

This will be an absolute disaster to the Ocean and all Marine life.

Comment Number: BOEM-2024-0008-0586-0005
Commenter Type: Individual
Commenter: Theresa Teti

Comment Excerpt Text:

The number of dolphins and whales that are already washing up on the beaches is only the beginning.

Comment Number: BOEM-2024-0008-0587-0001
Commenter Type: Individual
Commenter: Eryn Topper

Comment Excerpt Text:

Included in this environmental impact statement will be an incidental harassment authorization, included on that list are critically endangered and protected species. Harassment of these mammals is illegal! (Marine mammal protection act)

Comment Number: BOEM-2024-0008-0588-0002
Commenter Type: Individual
Commenter: Kassandra Funkhouser

Comment Excerpt Text:

Included in this environmental impact statement will be an incidental harassment authorization, included on that list are critically endangered and protected species. Harassment of these mammals is illegal! (Marine mammal protection act).

Comment Number: BOEM-2024-0008-0589-0002
Commenter Type: Individual
Commenter: Mary Beth Feeney

Comment Excerpt Text:

We already have 108 dead whales in the last 16 months that this agency and NOAA refuse to acknowledge the correlation from sonar mapping. This is prior to any construction. This is not counting the dozens upon dozens of dead porpoises, dolphins, sea turtles, and horseshoe crabs.

Comment Number: BOEM-2024-0008-0589-0005
Commenter Type: Individual
Commenter: Mary Beth Feeney

Comment Excerpt Text:

If these were oil rigs these projects would have been stopped at the third whale, but here we are at 108 and still counting. We know these projects depend on Fossil fuels for construction, shipping and ongoing power. They are unreliable, caustic and will simply electrify our beaches. How these projects have been lock step green lighted is simply horrifying, with the twisted reality that they are backed by big oil.

Comment Number: BOEM-2024-0008-0593-0001
Commenter Type: Individual
Commenter: Capt. Eric Muller

Comment Excerpt Text:

Please consider the spike in whale deaths since the start of the marine survey work . Even though your scientists have not determined the cause of death has correlation to the survey vessels , they also have not confirmed that they are not caused by this activity .

Comment Number: BOEM-2024-0008-0611-0013
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

Regarding probable serious harm or damage to marine life, specifically the critically endangered North Atlantic right whale, from operational noise, Save LBI and its expert acoustic consultant analyzed and provided to the BOEM in our comments on the Atlantic Shores South draft EIS a detailed quantitative assessment of the operational turbine noise impact from the wind complexes planned off the New Jersey and New York coasts. That analysis found that:

Prior measurement studies of the trends in turbine noise source level versus turbine power allow for a reliable prediction of a noise source level between 181 to 192 dB from the turbines and foundations expected here.

Past agency practice and measurements of noise transmission loss provide reliable noise transmission loss factors of 15 dB for noise spreading loss and 0.35 dB per kilometer for seabed attenuation.

Even with the lower noise source level of 181 dB and those noise loss parameters, it requires 12 miles from the perimeter of the wind complex for the noise to dissipate to 120 dB, the NMFS level for behavior disturbance.

The results are shown in the map below. The green line represents the North Atlantic right whale's historic migration range, within 56 miles from shore.

The red lines represent the distance from the wind complexes where the noise level will exceed the 120 dB level that will according to NMFS criteria disturb the whale's behavior.

[See original comment for figure]

There is general scientific consensus that the whale will try to avoid or stand-off from continuous noise above 120 dB.

Given that, there is no route the whale could take within its historic migration range and avoid the 120 and greater dB noise levels, thus jeopardizing its migration and continuing existence.

There are no practical, observational mitigation measures that can be applied in an operational turbine setting.

To leave the right whale and others a migration corridor, wind energy projects in either the closer to shore New Jersey lease areas or the farther out New York Bight areas must cease. Given the other adverse impacts of the close-in lease areas on shore communities the choice should be obvious to any responsible decision maker.

Comment Number: BOEM-2024-0008-0611-0050
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

And we concluded that the vessel surveys were the likely cause of the whale deaths, and suggest the following:

The survey areas should be cut back to only what's necessary to characterize the lease area and the export cable routes. Any future turbine locations should be determined by the agency through the proper program and environmental reviews, and not prejudiced by these surveys.

The energy inputs to the noise devices should be made public, reviewed and as appropriate adjusted downward.

A coordinated data sharing survey program using fewer vessel surveys should be set up.

Failing that, the vessel surveys should cease until a proper, thorough, and independent investigation is done.

Comment Number: BOEM-2024-0008-0611-0051
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

No Other Plausible Causes for the Deaths Have Been Put Forward. Some say that the recent whale and dolphin deaths are due to vessel strike and entanglements or changed feeding patterns due to climate change. These do not bear up. Commercial vessel activity off the NJ area actually decreased from November 2022 during the time of the whale deaths. Only 20 percent of the whale deaths have been connected by the NJ Marine Mammal Stranding Center to "blunt force trauma" and "possible vessel strike", and even those could have been precipitated by disorientation from the vessel survey noise. The agencies often cite a 40 percent number due to vessel strike, but that is actually 40 percent of the whales examined, and only about half are examined. Additionally, they jump from "blunt force trauma" which could also come from beach stranding and "possible vessel strike" to vessel strike. In addition, as far as we know, no study shows a change in zooplankton locations here, and even if there were, it would not explain why whales would die from feeding in a new location.

So, actually there is a good deal of evidence of vessel survey cause, summarized here.

Summary of "The Evidence"

There have been unprecedented spikes in whale deaths

They began locally when the vessel surveys increased.

The time and place of the whale deaths coincides with survey vessel presence

The elevated noise range from the vessel is underestimated

The indirect harm and fatality from disturbance level noise is not addressed, nor is the effect of repeated disturbances on an animal from passes from the same vessel, or from overlapping surveys.

There have been many whale stranding events worldwide with noise devices having similar horizontal noise patterns

No other plausible cause has been put forward

Comment Number: BOEM-2024-0008-0611-0055
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

Finally, the BOEM's logic here is backwards. It implies for example that because a large number of right whales may die in the future from vessel strike and entanglements that it's not so bad if a smaller number die from noise, a new stress. But rather a responsible decision maker would look at it the other way in context, that because bad impacts are happening over which the decision-maker has little or no control

then he/she should be especially concerned with adding any additional impact to that situation. This would be especially important e.g., regarding endangered species, where the addition of an added stress, even if smaller in magnitude than ongoing ones, can be quite detrimental to the species.

Comment Number: BOEM-2024-0008-0640-0003
Commenter Type: Individual
Commenter: Anne Baker

Comment Excerpt Text:

Besides destroying the beauty of our horizon with hundred of these huge pricks sticking up out of our ocean, we'll see the carcasses of mammals destroyed when sonar & noises emitted by these powerful machines, as well as dozens, hundreds, or thousands of birds cut down by these fast-moving blades.

Comment Number: BOEM-2024-0008-0645-0001
Commenter Type: Individual
Commenter: Patrice Tullai

Comment Excerpt Text:

The preliminary cause of mortality and serious injuries of whales are rope entanglement and vessel strikes. This is not the case here. Lobster and fishermen are being blamed, yet there have been zero North Atlantic Right Whale deaths in 20 years that could be attributed to lobster gear. This unprecedented whale death has been called an Unusual Mortality Event beginning in 2016. That coincides with the first permits issued by NOAA for sea floor mapping. Some says we cannot put the blame on wind turbines but here are some correlations so you can decide for yourself.

Comment Number: BOEM-2024-0008-0645-0003
Commenter Type: Individual
Commenter: Patrice Tullai

Comment Excerpt Text:

The concentration of five (5) whales deaths in the ASOW survey area combined with the voyages of Fugro Enterprise indicate a nexus between offshore wind activities and the death of the whales. Who is New Jersey Offshore Wind?

One might ask themselves, aren't these whales endangered species, there are only about

300 that remain, and the answer is yes. The North Atlantic Right Whale is listed as an endangered species and is therefore protected. But there is a little known activity called "take" and "incidental take", which actually allows for the death of a number of these whales.

"Take" as defined under the Environmental Safety Act (ESA) means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct.

"Incidental Take" is an unintentional, but not unexpected taking. When a species is listed as endangered, "take" prohibitions are automatically extended to it under ESA Section 9.

The National Oceanic and Atmospheric Administration (NOAA) and the Bureau of Ocean and Energy Management (BOEM) have both, permitted and allowed "incidental take" and are aware of Potential Biological Removal.

"Potential Biological Removal" is a term that defines the number of a species that can be removed

annually while allowing the species to reach or maintain its sustainable population.

The Potential Biological Removal for the Northern Right Whale is one (1).

Comment Number: BOEM-2024-0008-0645-0005
Commenter Type: Individual
Commenter: Patrice Tullai

Comment Excerpt Text:

Why is it critical to protect the whale? Whales are biological pumps for ocean nutrients. Huge whales plunge to 500 feet or deeper and feed on tiny krill. Then they return to the surfaceand poop. This 'whale pump' provides many nutrients, in the form of feces, to support plankton growth. The whale waste fertilizes phytoplankton growth by bringing nutrients to the ocean surface which promotes growth of ocean phytoplankton, microscopic plants that consume CO2 and create oxygen. This production of phytoplankton contributes at least 50% of all oxygen to the Earth's atmosphere and keeps the oceans alive and oxygenated. In addition to whales binding significant amounts of CO2 themselves, the phytoplankton capture as much CO2 as four Amazon forests so are critical for maintaining stable oxygen and carbon cycles.

Comment Number: BOEM-2024-0008-0651-0005
Commenter Type: Individual
Commenter: Elizabeth Quattrochi

Comment Excerpt Text:

The Congressional intent of the MMPA is to protect whales and marine mammals that depend upon the "health and stability" of the marine ecosystem. The number of deaths attributed to Offshore Wind, whether direct or indirect, must be counted cumulatively. I will take it a step further. Death from all human activities need to be included in the cumulative count. It's absurd from an objective standpoint to be pointing fingers back and forth, to the fishermen, to the boaters, to this or that Wind lease. It's all human caused and it has reached critical mass. If you are committed to the ethical and legal duty vested in you, you will STOP AUTHORIZING THESE TAKES until the GAO study is completed and presented to Congress. If you do not stop now, recovery of some populations will be impossible.

Comment Number: BOEM-2024-0008-0653-0005
Commenter Type: Individual
Commenter: Michael Devlin

Comment Excerpt Text:

Further investigate the protection of endangered species of the right whale.
The Rand Acoustics LLC performed an independent study off the coast of New Jersey and produced a Technical Report, Sonar Vessel Noise Survey, May 2023. The study focused on the soundings associated with construction and operations and found those analyses performed wrt protection of the right whale population to be inadequate for determining the impact of The Atlantic Shores 0549 project on their population. "It is unclear that the mitigation methods set in place are adequate to protect the NARW and other ESA-listed mammals and marine species"

In a second report, Pile driving Noise Survey, Technical Report of March 28, 2024, Rand Acoustics LLC concluded: "Despite double bubble curtains and hydro damper, pile driving peak levels are comparable to seismic airgun arrays." "NMFS appears to have abandoned evaluation of its Level B behavioral

harassment threshold at 120 dB,rms which leaves insufficient protections in place for marine species behavioral harassment." The data acquired during the survey and subsequent review of project and regulator documents raise concerns of sufficient NOAA review methods and mitigation distances to protect the critically endangered North Atlantic Right Whale (NARW) and other marine species from behavioral harassment and hearing loss impacts from pile driving. "

5. Review the data found by Rand Acoustics LLC and launch new studies that are consistent with NMFS standards and take appropriate actions to eliminate or mitigate activities during construction and operations to guarantee protection of marine species including those endangered species.

Comment Number: BOEM-2024-0008-0660-0001
Commenter Type: Individual
Commenter: Jaime Mirabella

Comment Excerpt Text:

The lease area is in the migration path of the North Atlantic Right Whale -- a highly endangered species.

Comment Number: BOEM-2024-0008-0728-0003
Commenter Type: Individual
Commenter: Brian Thompson

Comment Excerpt Text:

And of course NOAA and others have yet to find proof that surveying and operation of wind turbines is killing any whales, while we know ship strikes and entanglements are the two primary killers.

Comment Number: BOEM-2024-0008-0730-0001
Commenter Type: Individual
Commenter: Elizabeth Raleigh

Comment Excerpt Text:

There are dead whales and dolphins washing up daily. Wind surveying and construction is the only different thing being conducted in the ocean where these mammals are dying. The decimation of our ocean and marine life should be stopped immediately to allow further research and investigation. To push this forward while marine life, particularly endangered species, are dying in such large numbers is unconscionable.

Comment Number: BOEM-2024-0008-0761-0017
Commenter Type: Individual
Commenter: John Deputato

Comment Excerpt Text:

As good stewards for the environment how can you proceed given the large number of whale deaths.

Doesn't that tell you something is wrong?

Comment Number: BOEM-2024-0008-0761-0018
Commenter Type: Individual
Commenter: John Deputato

Comment Excerpt Text:

As I mentioned, I've been on the Jersey shore all my life. And before last year, hearing about a whale stranding was extremely rare - if at all.

I was shocked to find out that NOAA Fisheries issues Level B take authorizations to harass marine life. These takes are necessary for the Atlantic Shores Survey ships to operate their sonar mapping. These takes estimate the number of a given species that will be harmed of the total in the area.

If the NOAA didn't believe harm could be caused by sonar mapping, then why issue a take? The Atlantic Shores South take authorization in May of last year included 130% of the Right Whale population, an endangered species and 46% of dolphins and 54% of seals.

I wouldn't believe it if I didn't see the take authorization for myself.

One wonders how many whales actually die that don't wash ashore. But don't worry,

NOAA Fisheries knows and calls it Cryptic Mortality. They estimate that strandings, only represent about a third of total marine mammal deaths.

With approximately 70 right whale females remaining this project is in direct violation of the Marine Mammals Protection Act and the Endangered Species Act.

Comment Number: BOEM-2024-0008-0780-0001
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

As a homeowner on the Jersey Shore, I am vehemently against this assault on our ocean and the impact it will have on marine life. These offshore wind turbines will cause more destruction & cost than any benefit. Please stop this nonsense.

Comment Number: BOEM-2024-0008-0789-0001
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

From SaveLBI May 1, 2024: "Another day, more tragic discoveries: a dead whale discovered in Bridgehampton, NY, along with a dolphin in Diamond Beach, Wildwood Crest, NJ. Three whales washed ashore in MA just last week. Additionally, a pilot whale was found deceased between Sandy Hook & Long Island yesterday. This alarming trend is far from normal." The OBVIOUS increase in whale deaths and strandings, leading to death, on the East Coast since 2015 is absolute cause for these Offshore Wind Projects to be stopped IMMEDIATELY.

Comment Number: BOEM-2024-0008-0793-0001
Commenter Type: Individual
Commenter: vanessa fiedler

Comment Excerpt Text:

It doesn't take even a scientist to know that the deaths of all these whales is due to these "energy efficient windmills". The death rates have gone up with the installation of the ones that were already placed. If you are so conscious of the betterment of the world, than reverse the installation of these monsters before you wipe out these beautiful animals.

Comment Number: BOEM-2024-0008-0808-0003
Commenter Type: Individual
Commenter: Dennis De Forest

Comment Excerpt Text:

Wildlife concerns:Offshore wind farms can disrupt marine ecosystems.Birds and marine mammals may collide with the turbines blades,leading to injury or death. Additionally, the construction process can disturb underwater habitats.

Comment Number: BOEM-2024-0008-0813-0002
Commenter Type: Individual
Commenter: Laurie Maxwell

Comment Excerpt Text:

It is difficult for any "reasonable" man (and scientist NOT paid for by an OSW stakeholder) to look at the data regarding the staggering uptick in incidence and prevalence of whale and dolphin deaths and not "connect the dots" to causation from acoustic survey work conducted simultaneously in area over the period.

Comment Number: BOEM-2024-0008-0815-0001
Commenter Type: Individual
Commenter: l. thompson

Comment Excerpt Text:

It is obvious to any sane individual that the number of whale and dolphin casualties in this location would be proof enough to cancel the industrialization of the eastern coastline. It must stop.

Comment Number: BOEM-2024-0008-0821-0001
Commenter Type: Individual
Commenter: Sue Liebross

Comment Excerpt Text:

Please cease the use of wind farms and explore other energy options- I have never seen or heard of the amount of poor marine mammals washing up on our shores.

Comment Number: BOEM-2024-0008-0837-0001
Commenter Type: Individual
Commenter: Chris Monahan

Comment Excerpt Text:

The proposed project, which plans to develop an area of approximately 81,129 acres off the coasts of New Jersey and New York, poses a significant threat to marine ecosystems. The construction and operation of wind turbines can lead to habitat disruption, noise pollution, and other forms of environmental stress that could irreparably harm marine wildlife.

Comment Number: BOEM-2024-0008-0838-0002
Commenter Type: Individual
Commenter: Kenneth Jones

Comment Excerpt Text:

and a hazard to our ocean resources and sea life.

Please stop now!!!

Comment Number: BOEM-2024-0008-0861-0001
Commenter Type: Individual
Commenter: Suzanne Bibbo

Comment Excerpt Text:

The evidence of the destruction of our oceans ecosystem grows daily. The deaths of our marine life are now being reported on an almost daily basis.

Comment Number: BOEM-2024-0008-0861-0003
Commenter Type: Individual
Commenter: Suzanne Bibbo

Comment Excerpt Text:

The ocean floor will continue to be disturbed, affecting the plankton and baby fish,and then all the way up the food chain, adversely affecting migration and breeding.

Comment Number: BOEM-2024-0008-0862-0001
Commenter Type: Individual
Commenter: MARY SHAPPELL

Comment Excerpt Text:

PLEAE STOP this wind farm development. This is OUR ocean and not yours for profit and destruction. There has been enough slaughter of our sea life and I expect if this doesn't end, we will continue to see the slaughter continue because of the destruction of their environment as it is.

Comment Number: BOEM-2024-0008-0874-0001

Commenter Type: Individual
Commenter: Kevin Simon

Comment Excerpt Text:

These windfarms are a detriment to all marine mammals as is evidenced by the whales that are washing up on shore weekly. Furthermore the navigation for transiting these windfarm areas is very dangerous as the radar echos are inconsistant and downright dangerous. These projects should all be stopped until further study is completed.

Comment Number: BOEM-2024-0008-0900-0001
Commenter Type: Individual
Commenter: Roslyn McGivney

Comment Excerpt Text:

I am vehemently opposed to the Industrialization of our ocean. Wind turbine preconstruction and construction will decimate the ocean's fragile marine ecosystem. There are many scientific studies that prove this. I have read numerous articles and studies over the past 1.5 years that main stream media is not covering. The cause and effect of sonar mapping = over 70 whales strandings in NJ alone, with hundreds of other cetacean deaths. Direct correlation between exhalation & decibel levels caused by sonar- Navy study provided. Couned, are only those who have washed ashore. We need to protect our endangered species. Additionally, the death counts will continue on a much greater level when pike driving begins. These deaths are not a coincidence, but are occurring with a direct correlation to this work.

Comment Number: BOEM-2024-0008-0904-0001
Commenter Type: Individual
Commenter: Andrew Coskey

Comment Excerpt Text:

I am deeply opposed to offshore wind. Originally, my thoughts were "oh this will bring some cool fishing close to the windmills" but my opinion has very much changed. I have seen the dead whales with no proper strikes, I spend lots of time in and around the ocean, and something seems off. This will only get worse if this is passed.

Comment Number: BOEM-2024-0008-0921-0001
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

I respectfully disagree with any and all plans to construct and operate the offshore wind energy project submitted by Atlantic Shores Offshore Wind, LLC (Atlantic Shores). To date numerous mammals and other marine life have been killed by these projects. An endangered species whale is included in these unnecessary deaths. To date in 2024, 22 whales, 18 dolphins, and 6 porpoises have been killed. It's only May. Check out the 2023 death statistics.
Our government has told us that these creatures have died from boat strikes and illnesses. That is nonsense and I believe, only stated as a cover up. It all comes down to greed, extortion and our officials are lining their pockets at the expense of our oceans.

Has anyone noticed that the deaths of these sea creatures are all in the vicinity of exploration of the wind turbines. Coincidence? I highly doubt that.

Comment Number: BOEM-2024-0008-0922-0004
Commenter Type: Individual
Commenter: John Maxwell

Comment Excerpt Text:

It is difficult for any "reasonable" man (and scientist NOT paid for by an OSW stakeholder) to look at the data regarding the staggering uptick in incidence and prevalence of whale and dolphin deaths and not "connect the dots" to causation from acoustic survey work conducted simultaneously in area over the period.

Comment Number: BOEM-2024-0008-0924-0002
Commenter Type: Individual
Commenter: Barbara Skinner

Comment Excerpt Text:

BOEM is playing hard and fast with this uneconomically sound fiscally disastrous endeavor ignoring cumulative impacts to a project mandated to supply AFFORDABLE electricity while conveniently going along with NOAA's outrageous IHAs, levels A and B which allow the extinction of the American Right Whale and hundreds of thousands of "harms" and kills or "takes"

Comment Number: BOEM-2024-0008-0948-0001
Commenter Type: Individual
Commenter: John Caruana

Comment Excerpt Text:

In the past couple of weeks whales and dolphins have been washing up dead multiple times a week in areas where wind installation work is in progress along the east coast. It seems unlikely to be a coincidence. Independent tracking of the AIS data of the survey ships and areas of marine mammal deaths is pointing to a correlation. I was at the New Bedford whaling museum last summer and they have an extensive exhibit on the impact of sound on whales and other marine mammals, and how the US Navy does extensive work to minimize their impact on whales. Yet now independent testing has shown that the underwater noise level of the wind turbine installations far exceeds what the companies disclosed. New research shows that scallops are impacted by these installations also, backing up reports from fishermen of dead zones around the turbines. These projects require NOAA Incidental Take Authorizations which shows that it is known that marine mammals are being harmed, and the offshore wind companies are setting up funds for fishermen knowing that fish habitat will be impacted. The destruction these projects will cause is immeasurable.

Comment Number: BOEM-2024-0008-0964-0002
Commenter Type: Individual
Commenter: Sally Barbato

Comment Excerpt Text:

The planned locations are absolutely absurd in relationship to migration corridors to the many endangered

species of whales and sea birds.

Comment Number: BOEM-2024-0008-0964-0004
Commenter Type: Individual
Commenter: Sally Barbato

Comment Excerpt Text:

As of Dec 2019 there are less than 350 North Right Whales (NARW) alive in the world. Detected mortalities outnumber births by 3 to 2 and their population continues to be in decline. In July 2020, the International Union for Conservation of Nature (IUCN) changed the Right Whales status from endangered to critically endangered. That is -- they are at high risk for global extinction.

Comment Number: BOEM-2024-0008-0969-0009
Commenter Type: Local Government
Organization: Long Beach Township, NJ

Comment Excerpt Text:

MARINE MAMMALS
- Cumulative analysis of the impact to marine mammal migration patterns

---

Comment Number: BOEM-2024-0008-0970-0012
Commenter Type: Individual
Commenter: denise boccia

Comment Excerpt Text:

"When a humpback whale launches itself out of the water, it seems to hang in the air briefly before then plunging into the water on its back with a huge splash. The animal is as long as a city bus and technically has no natural enemies. Indeed, the only threat to its life is presented by human interaction. The seemingly endless ocean, after all, has become crowded." And the industrialization of the Atlantic Ocean with o?shore wind turbines will only add to such threats.

Comment Number: BOEM-2024-0008-0977-0001
Commenter Type: Individual
Commenter: Jill Magill

Comment Excerpt Text:

You must consider the sonar killing the marine mammals and exhausting the shellfish, the impact on the fishing industry. The number of dead whales and dolphins on south Jersey shores has risen. It's fact. Also scallopers are reporting never before seen numbers of dead scallops being harvested. Please look into these things and protect our marine life as it impacts our lives.

Comment Number: BOEM-2024-0008-0982-0001
Commenter Type: Individual
Commenter: Ian Glennen

Comment Excerpt Text:

So all this is futile, we will stop you from killing our way of life ,and you will fail in the end,and the cover up of all the mammal deaths will be known too all. All this Permited by our Gov in Takes, 900 alone on an endangered NRW !

Comment Number: BOEM-2024-0008-0988-0001
Commenter Type: Individual
Commenter: Lisa Gallant

Comment Excerpt Text:

I have watched, especially this past year, with pain, sorrow, and fury as the Atlantic Shores of the USA have been littered with carcasses of marine life.

Comment Number: BOEM-2024-0008-0996-0001
Commenter Type: Individual
Commenter: Apostolos Gerasoulis

Comment Excerpt Text:

I urge you to reject the Environmental Impact Statement for the construction and operation plan submitted by Atlantic Shores North, due to compelling evidence of a strong correlation between whale deaths and offshore wind surveying activities.

SEE ORIGINAL COMMENT FOR GRAPH: Image1: Humpback Whale Deaths per Year in (States:NY_NJ_RI) Polygon
Evidence of Impact: The data in Image1 presents a troubling increase in humpback whale mortality in the area where Atlantic Shores operations have commenced. Specifically, our Bayesian analysis shows:

- Pre-Survey Period Mean: Prior to 2015, the average annual whale deaths were 2.33, with a standard deviation (SD) of 0.57, indicating a relatively stable and low mortality rate.
- Post-Survey Period Mean: After the initiation of offshore wind surveying in 2015, the mean whale deaths per year escalated to 9.87, with an SD of 2.09. This nearly fivefold increase in the mean, coupled with a rise in variability, signifies a substantial and troubling increase in whale deaths.
- Variability in Whale Deaths: There was also a marked increase in the standard deviation of annual whale deaths, from 0.57 before 2015 to 2.09 afterwards, indicating that the variability of mortality rates has significantly increased, suggesting more erratic and elevated death counts.
- Change in Average Deaths (Delta Means): The difference in average annual whale deaths pre- and post-2015 is 7.54, with an SD of 2.16, quantifying a pronounced and statistically significant shift in mortality patterns.

Comment Number: BOEM-2024-0008-0996-0003
Commenter Type: Individual
Commenter: Apostolos Gerasoulis

Comment Excerpt Text:

The statistical analysis reveals a significant increase in whale deaths since 2015, with a 94% Highest

Density Interval (HDI) ranging from 3.43 to 11.57, clearly excluding zero. This indicates that the rise in mortality is a genuine change and not merely due to random fluctuations. The robust statistical evidence firmly supports the conclusion that the variation in whale deaths is statistically significant and scientifically validated.

Comment Number: BOEM-2024-0008-0996-0005
Commenter Type: Individual
Commenter: Apostolos Gerasoulis

Comment Excerpt Text:

Hypothesized Factors: Despite no significant increase in ship traffic in 2017, the surge in both whale deaths and ship strikes has spurred various theories. These include possible shifts in prey migration patterns into shipping lanes, redirection of whales into these lanes due to ocean noise pollution, or environmental changes such as upwelling or current alterations.

NOAA's Observations: Interestingly, NOAA's reports have confirmed evidence of entanglement in only one whale in 2017, which is surprising given the circumstances. This observation suggests that other factors may be more significantly contributing to the increased mortality rates.

NOAA's Ongoing Investigation: NOAA has committed to thoroughly investigating the abrupt rise in ship strikes and whale fatalities reported in 2017. To date, however, a conclusive explanation or primary cause remains elusive. This situation highlights the complexity of marine ecosystem dynamics and underscores the urgent need for continued and comprehensive research to better understand and mitigate these incidents.

Regulatory Oversight Concerns: There appears to be a lack of effective monitoring and regulation of these survey activities by BOEM. This regulatory gap increases the risk to marine life, as indicated by the data and the severe implications of the survey equipment used.

Comment Number: BOEM-2024-0008-0996-0006
Commenter Type: Individual
Commenter: Apostolos Gerasoulis

Comment Excerpt Text:

Correlation Between Survey Traffic and Whale Mortality: The provided image2 illustrates a significant correlation between offshore wind surveying activities and the variability in whale deaths. This relationship is crucial as it helps to discount other potential causes such as climate change or large vessel traffic.

- Climate Change: The impact of climate change on the environment typically evolves gradually and cannot account for the sharp fluctuations in whale deaths observed. Therefore, it is unlikely to be a direct factor affecting the rapid variability we are witnessing.

- Container and Large Ship Traffic: This category of maritime traffic has consistently adhered to designated shipping lanes and was well-established long before the noticeable uptick in whale mortality that began in 2015. Historical data from the period before 2015 shows minimal variability in whale deaths, strongly suggesting that changes in shipping patterns are not the primary cause of the recent surge in mortality rates. Moreover, NOAA has reported that interactions between humpback whales and ships account for only 40 percent of cases, with existing data unable to determine conclusively whether these interactions occurred before or after the whales' deaths. Importantly, no satisfactory explanations have been provided for the remaining 60 percent of whale fatalities, which remain unaccounted for in relation

to ship interactions. This substantial gap in understanding highlights the need for further investigation into other potential factors contributing to the increase in whale deaths.

- Other Excluded Factors: NOAA has ruled out entanglement as a primary cause, given the contradictory nature of the variability in deaths. Additionally, viral causes have been dismissed following necropsy results. This further narrows down the potential influences impacting whale mortality.

Impact of Offshore Wind Surveying: The only significant change post-2014 that aligns with the variability in whale deaths is the increase in offshore wind surveying. This activity varies across different wind project sites, with some located in regions of higher whale concentrations than others. This variable intensity and location of surveying activities could explain the fluctuating whale death rates observed.

Case Study August 2023, New York Bight Area: In August 2023(second Image), a noticeable spike in survey traffic coincided with the deaths of six whales in the New York Bight area, a region known as a feeding ground for whales during this month. Conversely, in 2022(first Image) , with no survey traffic reported, there were zero whale deaths in the same area. This stark contrast provides a compelling, localized example of how survey activities are directly impacting whale mortality.

Comment Number: BOEM-2024-0008-1008-0002
Commenter Type: Individual
Commenter: John Casagrande

Comment Excerpt Text:

In addition, the turbines cause substantial environmental damage. The surveying efforts over the last 18 months have resulted in hundreds of deaths (at least) of marine mammals.

Comment Number: BOEM-2024-0008-1010-0009
Commenter Type: Local Government
Organization: Cape May County, NJ

Comment Excerpt Text:

Environmental impacts from offshore wind and its effect on marine species are of paramount concern. The proposed array of turbines poses a severe threat to marine ecosystems, as well as the flight paths of migratory birds. The proposed array of turbines is situated well within the boundaries of endangered marine mammals' migratory paths. In fact, the North Atlantic right whales (NARW) primarily occur in Atlantic coastal waters on the continental shelf, although they also are known to travel far offshore over deep water. [Footnote 5: National Oceanic and Atmospheric Administration | U.S. Department of Commerce; North Atlantic Right Whale] This is significant, as the NARW is an endangered species. Not only does the placement of turbines affect the migratory paths of marine animals, but the noise associated with construction of these wind turbines is detrimental to the viability of these majestic creatures.

Comment Number: BOEM-2024-0008-1025-0001
Commenter Type: Individual
Commenter: Gilbert Foulon

Comment Excerpt Text:

There has been an unprecedented uptick in marine mammal deaths since the sonar mapping has started, this is undeniable. The stock answer of there is no study that shows they are related is completely bogus.

There is also no study that shows they are unrelated, and until there is a study, not paid for by interested parties, that shows definitively why all these whales and dolphins are being killed in such numbers, these projects should be halted.

Comment Number: BOEM-2024-0008-1032-0001
Commenter Type: Individual
Commenter: Mary Hodge

Comment Excerpt Text:

once they kill off life in the ocean, all life will cease to exist on Earth. And this is what the wind turbines will do. They are killing marine mammals and other life with their sonic testing. They are dredging up sediments and disrupting the entire food chain, again, upon which all life exists. The effects of the electronic cables and all the chemicals that will be spilt will alter reproductive lifecycles.
The fact that the federally protected endangered Right Whales, of which there are only 360 left in existence, including only 70 breeding females, should be reason enough to thwart this permit, as this mammal's habitat travels up the entire Atlantic Coast.

Comment Number: BOEM-2024-0008-1036-0001
Commenter Type: Individual
Commenter: Kevin Collins

Comment Excerpt Text:

One of the most concerning aspects of this proposal is the documented correlation between increased wind farm activity and occurrences of dead whales. Numerous studies have shown a significant uptick in whale mortality rates in areas where offshore wind farms are prevalent. This correlation cannot be ignored, and it raises serious questions about the long-term consequences of such projects on marine life.

Whales are essential to the health of our oceans and play a crucial role in maintaining ecological balance. The potential harm inflicted upon these magnificent creatures by the proposed wind project is simply unacceptable. Moreover, the loss of biodiversity resulting from increased whale deaths could have far-reaching implications for marine ecosystems.

Furthermore, the environmental impact assessment provided in the proposal fails to adequately address these concerns. It is imperative that a thorough and impartial evaluation of the potential risks to marine life, particularly whales, be conducted before any further progress is made on this project.

Comment Number: BOEM-2024-0008-1038-0001
Commenter Type: Individual
Commenter: Kathleen Harper

Comment Excerpt Text:

Keep our Ocean turbine free. Dead whales and dolphins are washing on beaches in areas that wind turbine sonar testing and where construction is occuring. Stop lying to the public and admit to the public and admit that take charts are needed because wind activity leads to whale deaths

Comment Number: BOEM-2024-0008-1043-0001
Commenter Type: Local Government
Organization: Borough of Sea Girt, NJ Planning Board

Comment Excerpt Text:

A concern regarding the potential disruption to the oceanic waters, the marine life, and the marine habitat as a direct and indirect result of the proposed development

Comment Number: BOEM-2024-0008-1043-0002
Commenter Type: Local Government
Organization: Borough of Sea Girt, NJ Planning Board

Comment Excerpt Text:

A concern regarding the potential disruption to endangered species which inhabit the affected beach areas

Comment Number: BOEM-2024-0008-1050-0002
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

It is too close to the North Atlantic Right Whale's migration corridor. There has been an unprecedented amount of marine mammal deaths since surveying begun for similar projects off the east coast since 2016, and we have evidence of a connection between survey vessels and mammal deaths.

Comment Number: BOEM-2024-0008-1069-0010
Commenter Type: Advocacy Group
Organization: Clean Ocean Action

Comment Excerpt Text:

There is a particularly glaring data gap regarding baleen whale hearing. [Footnote 6: Takes of Marine Mammals Incidental to Specified Activities; Taking Marine Mammals Incidental to Marine Site Characterization Surveys Off New York, New Jersey, Delaware, and Maryland 89 FR 753, 761 (Jan. 5, 2024) ("no direct measurements of hearing ability have been successfully completed for mysticetes").] A 2015 University of Santa Cruz study indicated that pinnipeds were more sensitive to high-frequency noise than was previously predicted. [Footnote 7: Kane Cunningham, Pinniped Hearing in a Changing Acoustic Environment, U.C.S.C. ESCHOLARSHIP (2015), https://escholarship.org/uc/item/737223k8] Kane Cunningham, Pinniped Hearing in a Changing Acoustic Environment, U.C.S.C. ESCHOLARSHIP (2015), https://escholarship.org/uc/item/737223k8][7] The same study outlined a myriad of factors that could affect how noise travels in the marine environment, suggesting that frequency is far from the whole story of how noise reaches and affects pinnipeds. [Footnote 8: Id] This speaks to how little is currently understood, especially given that proposed offshore wind development has increased exponentially in the New York Bight in a short amount of time. Functional and behavioral changes within populations or species can happen quickly, so if BOEM has an underdeveloped understanding of marine mammal species' current auditory abilities, population metrics, and environmental challenges, the agency cannot accurately plan protection and mitigation measures for future unforeseen impacts. Improving the quality and coverage of PAM efforts will more so benefit cetacean populations years in the future than the current populations, as it takes a longer-term dataset to control for seasonal weather variability and other variable ocean conditions.

Comment Number: BOEM-2024-0008-1069-0017
Commenter Type: Advocacy Group
Organization: Clean Ocean Action

Comment Excerpt Text:

COA opposes the use of once-through cooling systems in all industries, as they have significant adverse impacts on marine ecosystems. [Footnote 17: Clean Ocean Action, Position Paper On Oyster Creek Nuclear Generation Station's Cooling Water SYSTEM (2010) (on file with COA) Studies conducted on once-through cooling system discharges from other power plants have shown that these discharges are several degrees warmer than surface temperature of the receiving waterbody(ies) and are detrimental to various forms of marine life. Coastal power plants with once through cooling systems have been found to entrain and impinge millions of fish and larvae within the space of two years.

Comment Number: BOEM-2024-0008-1069-0018
Commenter Type: Advocacy Group
Organization: Clean Ocean Action

Comment Excerpt Text:

] Once-through cooling systems significantly change the bacterioplankton community. [Footnote 19: Meora Rajeev et al, Thermal discharge-induced seawater warming alters richness, community composition and interactions of bacterioplankton assemblages in a coastal ecosystem, SCI. REPORTS (Aug. 30, 2021), https://www.nature.com/articles/s41598-021-96969-2; Jebarathnam Prince Prakash Jebakumar et al, Impact of a Coastal Power Plant Cooling System on Planktonic Diversity of a Polluted Creek System, 133 MARINE POLLUTION BULLETIN 378 (Aug. 2018), https://doi.org/10.1016/j.marpolbul.2018.05.053] In one study, phytoplankton population density decreased by 64%, zooplankton density decreased by 93%, and loss of fish larvae impacted local fisheries. [Footnote 20: Jebarathnam Prince Prakash Jebakumar et al, Impact of a Coastal Power Plant Cooling System on Planktonic Diversity of a Polluted Creek System, 133 MARINE POLLUTION BULLETIN 378 (Aug. 2018), https://doi.org/10.1016/j.marpolbul.2018.05.053.]

Comment Number: BOEM-2024-0008-1069-0020
Commenter Type: Advocacy Group
Organization: Clean Ocean Action

Comment Excerpt Text:

Marine life that become habituated to the warmer temperature can be killed from thermal shock in th e event of a planned or emergency shutdown of the cooling system.

Comment Number: BOEM-2024-0008-1069-0031
Commenter Type: Advocacy Group
Organization: Clean Ocean Action

Comment Excerpt Text:

BOEM should take a precautionary approach and plan offshore wind development around the results of the GAO study, a pilot project, and an independent investigation into the heightened marine mammal deaths off New Jersey and New York.

Comment Number: BOEM-2024-0008-1069-0005
Commenter Type: Advocacy Group
Organization: Clean Ocean Action

Comment Excerpt Text:

This approach of learning as development progresses is not environmentally responsible. Moreover, it is the same approach that led to rapid, unsustainable industrialization and the current climate crisis. BOEM should prioritize improving its understanding of the marine environment, especially in the regions where development is occurring. COA continues to call for offshore wind development to be stopped until the forthcoming Government Accountability Office cost/benefit analysis of offshore wind in the North Atlantic is released and recommendations are implemented, a representative pilot project is evaluated, and the cause of the marine mammal deaths off the coast of New Jersey and New York (discussed in Section III(a)) is determined by an independent scientific investigation.

Comment Number: BOEM-2024-0008-1069-0009
Commenter Type: Advocacy Group
Organization: Clean Ocean Action

Comment Excerpt Text:

Because marine mammal hearing is difficult to study, animals are often grouped based on anatomy, rather than studying the hearing of specific species and how they may be impacted by surveying activities and construction noise.

Comment Number: BOEM-2024-0008-1070-0012
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Many marine mammal and sea turtle species are under extreme stress due to climate change, vessel traffic and collisions, entanglement with fishing gear, and other changes in the marine environment. It is critical to the health of many of these species that we not only transition away from climate warming fossil fuels to renewable resources such as offshore wind, but also that we develop offshore wind resources in a way that does not exacerbate these other environmental stressors.

Comment Number: BOEM-2024-0008-1070-0016
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

North Atlantic Right Whale

The North Atlantic right whale remains one of the most endangered large whale species, with only about 350 individuals remaining in the population. [Footnote 31: New England Aquarium, Scientists release annual population estimate for critically endangered North Atlantic right whale amid ongoing threats. Press Release (Oct 23, 2023), available at https://www.neaq.org/about- us/press-room/press-releases/2022-population-estimate-north-atlantic-right-whale/.] Atlantic Shores North must use the most recent population estimate of 356 (+7/-10) [Footnote 32: Linden DW. 2023. Population size estimation of

North Atlantic right whales from 1990-2022. US Dept Commer Northeast Fish Sci Cent Tech Memo 314.14.] in their consideration of the impacts of the proposed project on this imperiled species, and at present, the COP does not cite this number.

Comment Number: BOEM-2024-0008-1070-0017
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

How could operation sound from future offshore wind turbines impact marine life?

Comment Number: BOEM-2024-0008-1070-0048
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

The seriously imperiled North Atlantic right whale with approximately 350 individuals estimated remaining in 2022[Footnote 2: New England Aquarium, "Scientists release annual population estimate for critically endangered North Atlantic right whale amid ongoing threats." Press release (Oct. 23, 2023). https://www.neaq.org/about-us/press- room/press-releases/2022-population-estimate-north-atlantic-right-whale/.] is in dire straits from vessel strikes, entanglement in fishing gear, underwater noise pollution, and climate change, and cannot withstand further losses or additional stress.

Comment Number: BOEM-2024-0008-1070-0049
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Other marine mammal species particularly vulnerable[Footnote 4: Vulnerability level was determined based on several factors, including whether the species (and specific population stock) is listed under the Endangered Species Act, is currently experiencing or has recently experienced an Unusual Mortality Event, has a small population size and/or is range-restricted, or has outsized hearing sensitivity to noise.] to the potential impacts of offshore wind development in U.S. East Coast continental shelf waters include blue whales, fin whales, humpback whales, [Footnote 5: See, e.g., NOAA Fisheries, "2016-2024 Humpback Whale Unusual Mortality Event Along the Atlantic Coast." https://www.fisheries.noaa.gov/national/marine-life-distress/2016-2024-humpback-whale-unusual-mortality- event-along-atlantic-coast.] minke whales, sei whales, coastal bottlenose dolphins, harbor porpoises, and manatees. Five species of sea turtles (green, hawksbill, Kemp's ridley, leatherback, and loggerhead sea turtles) are found in U.S. East Coast waters and are protected under the Endangered Species Act due to a wide range of threats, including bycatch in fishing gear, vessel strikes, direct harvest of turtles and eggs, loss and degradation of nesting and foraging habitat, ocean pollution and marine debris, and climate change.

Comment Number: BOEM-2024-0008-1070-0051
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Risks from vessel collisions and noise impacts on marine mammals and sea turtles, including potential habitat displacement of marine mammals that may exacerbate existing threats, need to be fully addressed from the start.

Comment Number: BOEM-2024-0008-1070-0055
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Vessels: Science is unequivocal on the value of vessel speed restrictions in reducing mortalities of North Atlantic right whales, other large whale species, and sea turtles from vessel collisions.

Comment Number: BOEM-2024-0008-1070-0057
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Entanglement risk must also proactively managed. Floating offshore wind platforms pose a unique risk of potential entanglement of marine wildlife due to their extensive underwater mooring and cable systems, which could ensnare marine debris.

Comment Number: BOEM-2024-0008-1070-0059
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Marine mammals and sea turtles (and also sharks and diving birds) are at risk of becoming entangled on marine debris that becomes ensnared around floating offshore wind lines and cables. There is also a potential risk that large whales may become entangled in the offshore wind lines and cables themselves, or that materials already entangling whales may become ensnared on the infrastructure.

Comment Number: BOEM-2024-0008-1074-0001
Commenter Type: Individual
Commenter: William Ames

Comment Excerpt Text:

There is no reason to commence building these turbines until a longterm study has beenc completed by a third party platform into the deaths of so many sea mammals, and other ocean creatures and the long term effect of wind turbines on their habitat,

Comment Number: BOEM-2024-0008-1082-0002
Commenter Type: Individual
Commenter: Denis Meyers

Comment Excerpt Text:

Scores of whales have washed up on the shore that have been killed by these turbines. Plus, these instruments have been proven not only to be a blight but a complete waste of investment as they do not benefit the environment, kill air and sea creatures, are not efficient and required extensive support and maintenance and do not result in reduced costs in the supply of electricity.

Comment Number: BOEM-2024-0008-1083-0004
Commenter Type: Local Government
Organization: Borough of Sea Girt, New Jersey

Comment Excerpt Text:

We are deeply troubled by the potential impact of offshore wind turbines on our marine life and ecosystems. Sea Girt's coastal waters teem with diverse marine species, integral to our local ecosystem. Th e introduction of offshore wind turbines poses significant risks to these habitats, including noise pollution, habitat displacement, and the heightened risk of collisions with turbine structures. Protecting our marine life and preserving our coastal ecosystem is paramount for future generations.

Comment Number: BOEM-2024-0008-1088-0003
Commenter Type: Individual
Commenter: Mary O'Keeffe

Comment Excerpt Text:

It seems as though this project has no consideration for the ocean animals and the endangered species who call it home. Specifically the North Atlantic right whale.

Comment Number: BOEM-2024-0008-1092-0003
Commenter Type: Individual
Commenter: Sharon GARRY

Comment Excerpt Text:

So far,in the last 2 days, 2 more PROTECTED marine mammals died because of this madness.

Comment Number: BOEM-2024-0008-1096-0003
Commenter Type: Individual
Commenter: Teresa Boyle-Vellucci

Comment Excerpt Text:

The detrimental and adverse impact of this project on marine life has been made clear just last month. A humpback whale was found dead in Branch Beach in the beginning of April 2024. Also, our dolphin population has been extraordinarily sparce these past 2 years, in particular. Who is monitoring the dolphin population? There is no question that marine mammals communicate by sonar and the wind farm exploration process creates tremendous noise. It is not a logical position to take that the two are not connected. We have lived and been connected to the LBI community for 30 years. We have never seen

the numbers of mammals found dead on our shores in a year, ever, and have not ever seen such an absence of our beloved dolphins. When asked about the connection between the whales and dolphins showing up dead on our shores, which has been unprecedented, at the April 16, 2024 public meeting, the BOEM made a conclusory statement that there is/was no connection. It has presented, however, no support for the position it is taking.

Comment Number: BOEM-2024-0008-1100-0002
Commenter Type: Individual
Commenter: Erica Librizzi

Comment Excerpt Text:

It should not come as a shock to anyone that when we completely decimate these capabilities for them, with the introduction of our constant surveying sonar, pile driving, & construction, that these animals are succumbing to boat strikes and standings. 19 whale and dolphin deaths, just in NJ, just in the past three months, and just the ones that we were able to observe from being washed to shore. Shocking numbers directly related to the work being done off our coast. It's just unbelievably inhumane for us to recklessly destroy the lives of animals that have inhibited the ocean since the beginning of time. What gives us the right to claim their home as grounds for our destruction? The whales and the dolphins are commonly used as the most dramatic loss because of their size but what about the dozens of other creatures making up this already very fragile eco system. What about the endangered horseshoe crabs, the calms, scallops, mussels, sharks, fish, bats, birds, and flora.

Comment Number: BOEM-2024-0008-1106-0036
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

- Increased risk of vessel strike due to increases in vessel traffic and/or shifts in vessel traffic patterns due to the placement of structures. This should be comprehensive of all potential vessel transit routes, including near shore and estuarine/riverine areas where project vessels may operate;

Comment Number: BOEM-2024-0008-1106-0040
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

- Impacts to ecological processes from the presence and operations of WTGs including atmospheric energy extraction/wind wake effect and consequences to marine species, including ESA listed whales and sea turtles;

Comment Number: BOEM-2024-0008-1106-0065
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

Additionally, impact evaluation specificity between species groups (e.g., baleen whales, odontocetes) of marine mammals and sea turtles should be incorporated and analyses should identify effects to individuals

(e.g., injury, avoidance, disrupted foraging), as well as impacts at the population level.

Comment Number: BOEM-2024-0008-1106-0070
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

Consultations and Authorizations
ESA Section 7 Consultation
Under section 7(a)(2) of the ESA, each federal agency is required to ensure that any action they authorize, fund, or carry out is not likely to jeopardize the continued existence of any endangered or threatened species. Because the activities that would occur as a result of the approval of the COP may affect ESA-listed species and/or designated critical habitat (including surveys, construction, operation, and decommissioning), ESA section 7 consultation is required. It is our understanding that BOEM will be the lead federal agency for this consultation and will coordinate with any other federal agencies that may be issuing permits or authorizations for the Project, as necessary, so that we can carry out one consultation that considers the effects of all relevant federal actions (e.g., issuance of permits by the U.S. Army Corps of Engineers (USACE) and/or the U.S. Environmental Protection Agency (EPA) and issuance of any MMPA take authorization by NMFS). It is our understanding BOEM will develop a Biological Assessment (BA) to support the eventual request for ESA section 7 consultation. The information necessary to support a request for formal ESA section 7 consultation is outlined in 50 CFR 402.14(c). The BA must contain a thorough and complete description of the proposed action which includes all proposed mitigation measures. The BA must also reflect consideration of not only the construction, operation, and decommissioning of the planned Project, but any and all proposed survey or monitoring activities, including those for fisheries resources. We understand the BA and the NEPA document are likely to evaluate effects of activities consistent with a PDE and are likely to take a "maximum impact scenario" approach to assessing impacts to listed species. We encourage early coordination with us to determine which impact-producing factors should be analyzed based on a "maximum impact" scenario and which parts of the PDE would need to be narrowed to carry out a reasonable analysis to support ESA section 7 consultation. We encourage you to use the materials provided in the Additional Information section as you develop the BA.

Comment Number: BOEM-2024-0008-1106-0071
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

Marine Mammal Protection Act Incidental Take Authorizations
Section 101(a) of the MMPA (16 U.S.C. 1361) prohibits persons or vessels subject to the jurisdiction of the United States from taking any marine mammal in waters or on lands under the jurisdiction of the United States or on the high seas (16 U.S.C. 1372(a)(1), (a)(2)). Sections 101(a)(5)(A) and (D) of the MMPA provide exceptions to the prohibition on take, which gives NFMS the authority to allow the incidental, but not intentional, take of small numbers of marine mammals, provided certain findings are made and statutory and regulatory procedures are met. NMFS promulgated regulations to implement the provisions of the MMPA governing the taking and importing of marine mammals (50 Code of federal Regulations (CFR) part 216) and published application instructions that prescribe the procedures necessary to apply for an ITA.
U.S. citizens seeking to obtain authorization for the incidental take of marine mammals under NMFS' jurisdiction must comply with these regulations and application instructions in addition to the provisions

of the MMPA. For more information see: https://www.fisheries.noaa.gov/topic/laws-policies#marine-mammal-protection-act.

Because activities associated with the Project have the potential to result in the take of marine mammals, we anticipate that the Project's proponent will apply for an ITA pursuant to section 101(a)(5) of the MMPA. NMFS' proposal to issue an ITA that would allow for the taking of marine mammals, consistent with provisions under the MMPA and incidental to an applicant's lawful activities, is a major federal action under 40 CFR 1508.1(q) [Footnote 14: All references to the Council on Environmental Quality NEPA regulations included in this letter apply to the 2020 regulations effective September 14, 2020.], requiring NEPA review. Rather than prepare a separate NEPA document, NMFS, consistent with the CEQ regulations at 40 CFR 1506.3, intends to adopt BOEM's Final EIS to support its decision to grant or deny the request for an ITA pursuant to section 101(a)(5)(A) or (D) of the MMPA. NOAA may adopt a NEPA document prepared by another federal agency if the action addressed in the adopted document (or portion) is substantially the same as that being considered or proposed by NOAA, and NOAA determines the document (or portion) satisfies 40 CFR 1506.3. Per 40 CFR 1501.8, as a Cooperating Agency we must determine that the Final EIS properly addresses our comments and input in order for NMFS to determine the EIS is suitable and legally defensible for adoption per 40 CFR 1506.3 and NOAA's NEPA procedures [Footnote 15: NOAA Administrative Order (NAO) 216-6A "Compliance with the National Environmental Policy Act, Executive Orders 12114, Environmental Effects Abroad of Major federal Actions; 11988 and EO 13690, Floodplain Management; and 11990, Protection of Wetlands" issued April 22, 2016 and the Companion Manual for NAO 216-6A "Policy and Procedures for Implementing the National Environmental Policy Act and Related Authorities" issued January 13, 2017.] and issuance of an ITA. As such, the document body must contain the following items: the purpose and need of NMFS' action, a clear description of NMFS' roles and responsibilities as both a cooperating and adopting agency (please refer to language we previously provided to BOEM for the Atlantic Shores South project in our scoping letter dated October 29, 2021); and a reasonable range and evaluation of alternatives which incorporate a description of both NMFS' action and No Action alternatives. More details (including a summarized list) of NOAA's adoption requirements as well as additional information on 50 CFR part 216, and the ITA application process can be found in the Additional Information section below.

Comment Number: BOEM-2024-0008-1106-0008
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

Protected Species
The following listed species occur, at least seasonally, in the Atlantic Shores North lease area (OCS-A 0499): Endangered North Atlantic right (Eubalaena glacialis), fin (Balaenoptera physalus), sei (Balaenoptera borealis), and sperm (Physeter macrocephalus) whales; endangered Kemp's ridley (Lepidochelys kempii) and leatherback (Dermochelys coriacea) sea turtles; threatened North Atlantic distinct population segment (DPS) of green (Chelonia mydas) sea turtles and Northwest Atlantic DPS of loggerhead (Caretta caretta) sea turtles; and five DPSs of Atlantic sturgeon (Acipenser oxyrinchus oxyrinchus). Sea turtles are present in the lease area seasonally, with occurrence largely limited to April - November. Additionally, oceanic whitetip shark (Carcharhinus longimanus) and giant manta ray (Manta birostris) may occur in the more offshore portions of the lease area. More information on these species is available on our regional ESA website [Footnote 1: https://www.fisheries.noaa.gov/new-england-mid-atlantic/consultations/section-7-species-critical-habitat- information-maps-greater]. North Atlantic right whale sightings are available at our NOAA Right Whale Sightings Map page [Footnote 2: https://apps-nefsc.fisheries.noaa.gov/psb/surveys/MapperiframeWithText.html]. There is no designated critical habitat that overlaps with the lease area. Depending on vessel traffic routes, additional ESA species and/or

critical habitat may occur in the Project area. Please see Attachment C to this letter for a list of recommended scientific references for consideration related to the presence of ESA-listed species in or near the lease area.
The section of the EIS describing the Affected Environment for protected species should include information on the seasonal abundance, density (where available), and distribution of all ESA- listed species including marine mammals, sea turtles, ESA-listed fish, and any designated critical habitat. This information should include anticipated habitat uses (e.g., foraging, migrating) and habitats or prey these species depend on throughout the area that may be directly or indirectly impacted by the construction, operations, or decommissioning of the Project. The status of stocks, population trends, and threats should also be identified.

Comment Number: BOEM-2024-0008-1108-0048
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

Further, EPA encourages implementing time of year considerations for construction of the wind farm to reduce impacts to marine life, such as avoiding times of peak migration, etc. Consulting with the National Oceanic and Atmospheric Administration (NOAA) regarding issues related to marine mammals, essential fish habitat, and threatened or endangered species is expected.

Comment Number: BOEM-2024-0008-1112-0002
Commenter Type: Local Government
Organization: Sea Girt New Jersey

Comment Excerpt Text:

A concern regarding the potential disruption to the oceanic waters, the marine life, and the marine habitat as a direct and indirect result of the proposed development;
b. A concern regarding the potential disruption to endangered species which inhabit the affected beach areas;

Comment Number: BOEM-2024-0008-1112-0009
Commenter Type: Local Government
Organization: Sea Girt New Jersey

Comment Excerpt Text:

A concern regarding the impact the development will have on the fragile eco-system;

Comment Number: BOEM-2024-0008-1122-0001
Commenter Type: Individual
Commenter: Anonymous

Comment Excerpt Text:

WHALES DIDN'T DIE LIKE THIS UNTIL SONAR TEST FOR WIND TURBINES BEGAN.

Comment Number: BOEM-2024-0008-1129-0002
Commenter Type: Advocacy Group
Commenter: Annie Licata
Organization: Clean Ocean Action

Comment Excerpt Text:

COA also continues to request a federal investigation into the marine mammal deaths between December 2022 and November 2023 with a petition supported by nearly 400,000 people.

COA read the 524 comments from numerous concerned citizens, government agencies and organizations from the draft programmatic environmental impact statement from the National Marine Fishery Service to the National Park System, there were a lot of concerns, there are glaring data gaps and too many unknown.

For the Atlantic Shores North EIS, the corporation and the respective agencies should review and respond to the comments,concerns and requests already provided to you in the draft programatic environmental impact statement.

Comment Number: BOEM-2024-0008-1133-0003
Commenter Type: Individual
Commenter: Diane Snelson

Comment Excerpt Text:

These are the tallest and closest wind turbines that will exist in the United States or in the country? Where is the data to show that these close turbines aren't going to destroy the ecosystem, plus it's got impact on where the endangered whales migrate right through this area?

This isn't being addressed. There is definitely correlation between the dead animals, the whales and the dolphins washing up on our beaches, we have never seen anything like it.

Comment Number: BOEM-2024-0008-1137-0005
Commenter Type: Advocacy Group
Commenter: William Link
Organization: John Birch Society

Comment Excerpt Text:

This is not a very safe thing and we have already seen over 40 marine mammals that have been killed because of the sonar sounding. It doesn't directly kill, but it messes with their sonar and they run scared and run into ships.

So this has been dangerous, I haven't heard one thing about the marine mammal killing from anyone that is for this. So I don't think they actually do care about the marine life. I don't see where they even mentioned the fact that over 40 marine mammals have been killed.

I have lived in New Jersey my entire life, I am 66 years old, and I can only remember a few, less than a handful of marine mammal killings. And now all of a sudden there is over 40

Comment Number: BOEM-2024-0008-1138-0001

Commenter Type: Individual
Commenter: Kathleen Harper

Comment Excerpt Text:

The main thing that started me in this process was the amount of whales that were washing up along our eastern shore, and they are still washing up today.

A couple of days ago, we lost another whale in Virginia where they are doing pile driving and sonar mapping. This is not good for our environment, this is not good for endangered whales especially since it was a female Right Whale that we lost because there is so few of them, any female lost is putting the Right Whales closer and closer to extinction.

Comment Number: BOEM-2024-0008-1140-0001
Commenter Type: Individual
Commenter: John Magliochetti

Comment Excerpt Text:

Second, from an environmental perspective, BOEM needs to study specifically how construction and operation of these machines are driving marine life into the shipping lanes. I heard comments from politicians and others that the marine mammal deaths have not been caused by surveying or caused by the future operation of these machines but no one has commented on what is driving these creatures into the actual shipping lanes themselves.

So while it is true they are killed by marine traffic, what is causing them to venture so close to the vessels needs to be determined before the project is allowed to move forward.

Comment Number: BOEM-2024-0008-1143-0001
Commenter Type: Individual
Commenter: Sylvia Lockwood

Comment Excerpt Text:

An earlier caller mentioned if there is an issue or connection between the whale and dolphin deaths as a result of the offshore wind development. I'd like to bring attention back to the Atlantic Shores environmental impact statement table 4.1-1, potential unavoidable adverse impacts of the proposed action, specifically reads marine mammals, increased risk of increase TTS or PTS to individuals due to underwater noise from pile driving activities during construction, disturbance which is behavioral effects and acoustic masking due to underwater noise from pile driving, vessel traffic, aircraft, doing physical surveys, HRG surveys and geotechnical surveys, wind turbine generation operations, dredging during construction operations, increase risk of individual injury and mortality due to vessel strikes during instruction and installation and operation and maintenance and decommissioning and increased risk of individual injury and mortality associated with fisheries gear.

I can't wrap my head around the fact that in spite of this document and the Ocean Wind documents, they all have this unavoidable impact showing the connection and yet the government agencies and the most media outlets continue to say there is no connection. I mean there are an untold number of intake, I'm sorry, I am losing track, of takes that are issued that can harm them. Like there is absolutely a connection and we need to stop and pause these projects until we know more.

Comment Number: BOEM-2024-0008-1145-0001
Commenter Type: Individual
Commenter: Karen Sours

Comment Excerpt Text:

I have never heard of so many whales washing ashore anywhere and dying. There has to be a correlation, there is a correlation with when the exploratory sonar testing began and when these animals started to suffer and die.

Comment Number: BOEM-2024-0008-1150-0001
Commenter Type: Individual
Commenter: Laurie Maxwell

Comment Excerpt Text:

They are looking to keep New Jersey coast line pristine and when I say the coast line, I am talking the environmental, I am talking the animals, we had 19, 19 whales wash up where they started mapping. Think that's a coincidence? I don't.

Comment Number: BOEM-2024-0008-1154-0002
Commenter Type: Individual
Commenter: Robert Zuczek

Comment Excerpt Text:

We have seen numerous whales, numerous dolphins wash up on our shores off the over the past year, unprecedented in such a short period of time. These projects are catastrophic.

Comment Number: BOEM-2024-0008-1160-0001
Commenter Type: Individual
Commenter: Tricia Devoi

Comment Excerpt Text:

We have seen an unprecedented increase in whale strandings in New York and New Jersey over the past 14 months which corresponds with offshore wind vessel activity in our area. So although NOAA and scientists said there is no evidence linking offshore wind activity to the recent whale deaths, they are not providing any evidence that offshore wind activity is not contributing to the deaths, and the requests for IHAs actually indicate they know the activity will cause harm which is why they need permits, harassment permits.

Comment Number: BOEM-2024-0008-1160-0002
Commenter Type: Individual
Commenter: Tricia Devoi

Comment Excerpt Text:

Before anymore projects are approved including this one, I believe studies need to be conducted on the potential impact that offshore wind activity will have not only on marine mammals but on fisheries and all the marine life prior to the project approval and construction of these projects.

Comment Number: BOEM-2024-0008-1166-0004
Commenter Type: Individual
Commenter: Nancy Donovan

Comment Excerpt Text:

And also, I'm very concerned about the impact it will have on marine life, especially whales.

Comment Number: BOEM-2024-0008-1169-0001
Commenter Type: Local Government
Commenter: Justin Macko
Organization: Borough of Sea Girt

Comment Excerpt Text:

As a community deeply committed to the protection of the coastal environment and preservation of our local marine ecosystem, Sea Girt has consistently voiced serious reservations in opposition to offshore development initiatives. Our stance remains rooted in our concerns regarding the potential adverse impacts that such projects may inflict on marine and avian life and the aquatic ecosystems and the critical habitats that sustain them.

Comment Number: BOEM-2024-0008-1177-0004
Commenter Type: Individual
Commenter: Margaret Bagley

Comment Excerpt Text:

I also had a concern about I spoke to one of the marine specialists at the Atlantic City event about, you know, they said they had observers on these surveying vessels that would be on the look out for whales and if they were to spot a whale, they would stop whatever activity they were doing until the whale would leave the area. I am just curious to know whether any of the whales that have been washing up deceased were actually alive and well and spotted by any of these observers and if there is a way we can get that information if it's recorded, reported to someone somewhere, you know, was the whale alive a week ago and now it's not and it was spotted alongside one of these vessels, that's something that's a curious thing to consider.

Comment Number: BOEM-2024-0008-1195-0002
Commenter Type: Individual
Commenter: Sylvia Lockwood

Comment Excerpt Text:

The marine mammals that are dying, although there is claimed there is no connection, there are harassment authorizations that are authorized for their harm. Atlantic Shores potential unavoidable adverse impacts say that to marine mammals that there is an increased risk of injury to individuals due to underwater noise from the pile driving activities during construction, that there are disturbance, behavioral effects and acoustic masking due to underwater noise form the pile driving, vessel traffic, aircraft, geophysical surveys and geotechnical drilling surveys, wind turbine generation operation and dredging during construction and operations, increased risk of individual injury and mortality due to vessel strikes during construction and installation, operation and maintenance and decommissioning and increased risk of individual injury and mortality associated with fisheries gear.

Comment Number: BOEM-2024-0008-1195-0003
Commenter Type: Individual
Commenter: Sylvia Lockwood

Comment Excerpt Text:

There have not been independent studies that have said this is safe for our marine mammals. I think these are aggressive, you should have done studies prior to starting the offshore wind projects that are taking place on the east coast. That was not done. You are guessing and yet marine mammals are turning up dead.

I don't know how people that are involved at your level aren't asking more questions and not looking into these deaths. There are projects worldwide that are coming under criticism. There is so much contradictory information in what you are presenting and what is out there and I would hope that people would start to pay attention not just to the information that the developers are are sending and that the small numbers of people that are in power for the BPU, for instance unelected officials that are pushing this agenda as well, I think it's going to harm our environment irreparably and I hope that you will consider, excuse me, other viewpoints other than what you are currently operating on.

Comment Number: BOEM-2024-0008-1197-0001
Commenter Type: Individual
Commenter: Glenn Gorab

Comment Excerpt Text:

Now, to get back to the point about the whales being struck by ships, well, guess what, you don't have to be a scientist to know that the ocean is a very quiet place, and these whales have developed a tremendous sense of searing hearing so the while frequency of all the surveying, let alone the noise by the pile driving, ruins these mammals vestibular system. They can no longer hear, and like it was said before, a deaf whale is a dead whale.

Comment Number: BOEM-2024-0008-1202-0001
Commenter Type: Individual
Commenter: Kathryn Nguyen

Comment Excerpt Text:

The sound of installation from the windmills deafens aquatic life hearing is a critical sensory organ for marine life. A deaf marine mammal will soon be a dead marine mammal. The vibration is from the monstrosities throughout the aquatic domain adds intolerable stress to aquatic organisms. I am disheartened that Americans quest for more energy will destroy more virgin territory. Rather than finding ways to reduce the consumption, we plow forward with scant concern for the industrialization of all natural areas.

Comment Number: BOEM-2024-0008-1205-0004
Commenter Type: Advocacy Group
Commenter: Bob Stern
Organization: Save Long Beach Island Incorporated

Comment Excerpt Text:

Underwater noise to the marine mammals, some of the commentors have concerns about that, BOEM has

ignored evidence we have provided on the link of the whale deaths to the vessel surveys, you have underestimated the impacts of pile driving, we will be commenting on that, and most importantly you have ignored the issue of operational turbine noise which has a significant impact once the turbines are operating on marine mammal migration.

Comment Number: BOEM-2024-0008-1206-0001
Commenter Type: Individual
Commenter: Leslie Mangold

Comment Excerpt Text:

And I am opposed to it for many reasons and I guess the first and foremost is I cherish the beauty of the ocean and the marine life and to me and as probably I can't even guess the amount of people how devastating it is to see whales and dolphins lying dead on our beaches and this is unprecedented.

Comment Number: BOEM-2024-0008-1206-0003
Commenter Type: Individual
Commenter: Leslie Mangold

Comment Excerpt Text:

These creatures are mammals and they are like us, they think, they feel, they mourn, they communicate and they are suffering due to human activities. Over 230,000 incidental harassment authorizations have been issued also known as takes by the National Oceanic and Atmospheric Administration for marine mammals in relation to offshore wind construction activities.

A.3.15 Mitigation and Monitoring

Comment Number: BOEM-2024-0008-0138-0034
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

Mitigation measures for Project impacts on NARW, including vessel speed limits, must not include exemptions and exceptions, resulting in significant risks to NARW, including potential injury from vessel strikes and hearing damage from pile driving noise

---

Comment Number: BOEM-2024-0008-0444-0001
Commenter Type: Individual
Commenter: Theresa Klepczynski

Comment Excerpt Text:

Please stop the projects until a comprehensive study on the effects on every underwater living organisms, plankton to whales, can be determined!

Comment Number: BOEM-2024-0008-0524-0008
Commenter Type: Individual
Commenter: Sharon Mahoney

Comment Excerpt Text:

What operational mandates will be in place for Atlantic Shores in terms of monitoring, maintenance and emergency action when these chemicals are released into the ocean? Obviously monitoring and action is much more difficult out in the ocean when there is so little physical oversight at the site of the turbines. How will BOEM ensure that proper and timely action is taken in the event of a chemical leak?

Comment Number: BOEM-2024-0008-0551-0017
Commenter Type: Advocacy Group
Organization: RODA

Comment Excerpt Text:

In particular, we strongly advocate for the explicit inclusion of the Atlantic Surfclam Stock Enhancement Program using open ocean aquaculture within the environmental assessments for offshore wind developments, including Atlantic Shores North. RODA supports the comments submitted by Surfside Foods, LLC and incorporates them by reference. Inclusion of this program is crucial not only for preserving the surfclam populations and their habitats but also for ensuring that renewable energy development proceeds in a manner that is truly sustainable and mindful of existing marine industries. We urge BOEM to recognize this strategy as a fundamental component of the environmental impact statement, ensuring that identified and implementable mitigation efforts are fully integrated and actionable within the regulatory framework.

Comment Number: BOEM-2024-0008-0551-0018
Commenter Type: Advocacy Group
Organization: RODA

Comment Excerpt Text:

Given the level of disruption OSW development will cause to the local environment and the existing industries that rely on it, comprehensive mitigation strategies are essential. Early efforts focused on avoiding impacts could better frame mitigation conversations. Unfortunately, recently mitigation to the commercial fishing industry is focused on compensation. Mitigation is not synonymous with compensation.

Robust and consequential mitigation strategies absolutely must be created correctly from the onset. Fisheries mitigation must be developed thoughtfully and on an appropriate timeline. Such strategies need to be wholly designed with the industries directly impacted from development and with enough flexibility to allow for new information to inform them. Given the multitude of demands already on those working at the intersection of fisheries and OSW, and the complexities of ocean ecosystem science, this important component should not be ignored or only considered at the final hour. In many cases, non-compensatory mitigation measures may be region and fishery specific and BOEM must consider the mitigation potential from suggested programs in the development of this EIS.

Comment Number: BOEM-2024-0008-0551-0019
Commenter Type: Advocacy Group
Organization: RODA

Comment Excerpt Text:

Once avoidance, minimization, and mitigation measures have been exhausted through project design, impact fees to compensate for residual damage to regional seafood production must be required as a condition of any future permit. Fishing industry requests and positions regarding compensation are well documented. BOEM has an ethical and scientific obligation to recognize a process for developing a compensation framework only if it is driven by the fishing industry and fisheries science experts in a transparent and participatory manner.
Compensatory mitigation alone is not sufficient to meet NEPA requirements of avoiding, minimizing, and mitigating impacts to fisheries, nor does its implementation assure that an OSW project has been designed in a way that does not unreasonably interfere with fishing operations. However, customary practice supports compensatory mitigation for fisheries impacts after efforts to minimize and mitigate impacts have been fully employed. From an equity perspective, fishermen are by far the most impacted group with respect to OSW development. Despite this, financial offsets offered to fishermen pale in comparison to those invested by OSW developers, investors, and supporters to other interests. Approaches to impact fees must be developed by an independent party that is not able to be influenced by OSW advocates.

RODA has prepared guidelines from the seafood industry on impact fees [Footnote 15: See https://rodafisheries.org/wp-content/uploads/2021/12/RODA-Impact-Fees-Report_Dec21.pdf] and continues to participate in on-going discussion on the subject.

Comment Number: BOEM-2024-0008-0551-0022
Commenter Type: Advocacy Group
Organization: RODA

Comment Excerpt Text:

We take to heart recent requests from BOEM and OSW developers to include specific, actionable requests for fisheries mitigation measures to be included for consideration. Thus RODA recommends, at a minimum, the following alternatives for inclusion in the EIS and anticipate requesting additional specific measures as project plans and permitting develop:

- Transit lanes of 4 nm to allow safe transit of all mariners especially in inclement weather
- Available technologies and practices for the safety of all mariners operating in the vicinity of the WEA and for minimizing environmental impacts in the following areas:
- De-icing
- Cable mattressing
- Scour protection
- Cooling station
- Communication at sea
- Radar interference
- Vessel traffic
- Range of cable burial depths
- Performing "micrositing" of turbines, cables, substation(s), and CWIS with fishermen
- Monitoring fisheries impacts for the life or projects, especially changes in larval populations put at risk by the CWIS
- Requirements that would minimize the environmental impacts of project decommissioning
- No-surface occupancy areas with the lease area, if robust scientific analysis indicates the presence of important spawning and/or habitat areas

- Time of year restrictions during construction, operations, and decommissioning
- No-build setbacks from any important spawning/habitat areas
- Inclusion of an Atlantic Surfclam Stock Enhancement Program

Comment Number: BOEM-2024-0008-0551-0008
Commenter Type: Advocacy Group
Organization: RODA

Comment Excerpt Text:

If BOEM proceeds to prepare an EIS for this project, a detailed list of mitigation measures that should be included as alternatives to the proposed action is provided below. Applicants should identify design options that they anticipate may be of concern to co-located fisheries. These should include a reasonable range of options encompassing various operations and mitigation scenarios, not only those that maximize electricity generation or are narrowly tailored to meet the conditions of power purchase contracts signed prior to environmental review. Certain regions are already seeing fish stocks shift in response to changing ocean conditions. Applicants should also incorporate fisheries that are reasonably foreseeable to become co-located within the project area during the project's lifespan.

Comment Number: BOEM-2024-0008-0633-0025
Commenter Type: Federal Agency
Organization: Mid-Atlantic Fishery Management Council and New England Fishery Management Council

Comment Excerpt Text:

We remain concerned that BOEM has not yet released the final guidance on fisheries mitigation. The comment period for the draft guidance closed in the summer of 2022. Additional coordination with Tribes concluded in the summer of 2023. It is not clear why the final guidance has not yet been released. In the meanwhile, BOEM has continued releasing NEPA documents and approving offshore wind projects in the absence of this final guidance. BOEM should consider the recommendations listed in the wind energy policies adopted by both of our Councils, which apply across all projects. [Footnote 2: Available at https://www.mafmc.org/s/MAFMC_wind_policy_Dec2021.pdf.] Our two Councils worked together on and adopted the same wording for these policies. The recommendations outlined in these policies should be adopted as required mitigation measures for this project.

Comment Number: BOEM-2024-0008-0633-0026
Commenter Type: Federal Agency
Organization: Mid-Atlantic Fishery Management Council and New England Fishery Management Council

Comment Excerpt Text:

The information provided with the NOI indicates there is high or medium-high surfclam commercial fishing density throughout all of the lease area and part of the cable corridor. Ocean quahog commercial fishing density is high or medium-high in part of the lease area and cable corridor. There is high or medium-high scallop commercial fishing density in part of cable corridor and most of the lease area. There is very high monkfish and "MSB" (i.e., mackerel/squid/butterfish, species not specified) commercial fishing density in nearshore part of one of the cable corridors. This information can be used to consider project modifications and mitigation measures to reduce impacts; however, it is important to consider that the distribution of fishing effort changes over time based on a variety of factors and not all

impacts can be mitigated by modifying the design parameters of the project.

BOEM should require sufficient funds to be set aside to mitigate the negative impacts of this project on commercial and recreational fisheries, including shoreside businesses. Eligibility for compensation from these funds should not be overly restrictive based on metrics such as homeport. The fisheries the Councils manage are regional in nature. These lease and export cable areas are used by a variety of vessels which are homeported in many different states and often have permits to land their catch in multiple states.

Comment Number: BOEM-2024-0008-0633-0030
Commenter Type: Federal Agency
Organization: Mid-Atlantic Fishery Management Council and New England Fishery Management Council

Comment Excerpt Text:

We support time of year restrictions to reduce potential impacts to sensitive life stages of fishery species, to reduce impacts to commercial and recreational fisheries, and to reduce impacts to SAV and other structured habitats throughout the project area and cable route.

Comment Number: BOEM-2024-0008-0633-0031
Commenter Type: Federal Agency
Organization: Mid-Atlantic Fishery Management Council and New England Fishery Management Council

Comment Excerpt Text:

BOEM should consider mitigation measures that support vessel radar upgrades and training to minimize impacts to fishermen and others navigating through and around the project area.
Fishermen have noted a need to declutter radar within lease areas, otherwise fine scale targets may be lost while navigating through them. If AIS transponders are most appropriate on a subset of structures only (versus on every turbine, offshore substation, and any other offshore structures), BOEM should consult with the fishing industry and the U.S. Coast Guard to identify where AIS would be most helpful.

Comment Number: BOEM-2024-0008-0633-0009
Commenter Type: Federal Agency
Organization: Mid-Atlantic Fishery Management Council and New England Fishery Management Council

Comment Excerpt Text:

The recommendations outlined in the Council's offshore wind energy policies should be adopted as required mitigation measures for this project.

Comment Number: BOEM-2024-0008-0928-0010
Commenter Type: State Government
Organization: NJDEP

Comment Excerpt Text:

The need for survey mitigation is detailed in the NOAA Fisheries and BOEM Federal Survey Mitigation Strategy Northeast U.S. Region{{Footnote 1: Hare JA, Blyth BJ, Ford KH, Hooker BR, Jensen BM,

Lipsky A, Nachman C, Pfieffer L, Rasser M, Renshaw K. 2022. NOAA Fisheries and BOEM Federal Survey Mitigation Implementation Strategy -Northeast U.S. Region. NOAA Technical Memorandum 292. Woods Hole, MA. 33 pp}} . If a survey is not conducted the way it was designed, or if the environmental conditions that the design was based on significantly change, then the power of the survey to detect change is affected. As uncertainty in stock assessments rises, fishery managers must control the risk of overfishing by reducing harvest, which has a direct effect on the recreational and commercial fishing industries.

Comment Number: BOEM-2024-0008-0928-0011
Commenter Type: State Government
Organization: NJDEP

Comment Excerpt Text:

Figure 1. Colocation of Atlantic Shores North and NJ Ocean Trawl survey strata.

[See original comment for figure of the New Jersey coast]

The study design of the NJOT includes survey strata that are defined by habitat type. Post construction, turbine foundations and scour protection will be a new type of habitat that requires additional survey stratification. This is the minimum mitigation for the NJOT as the ASOW North project is developed; if the survey vessel is precluded from the lease area because of safety or insurance issues, the impact will be more significant and require additional mitigation.

NJDEP recommends a requirement that ASOW work with the NJ MRA to determine appropriate mitigation for the NJOT. It is also recommended that the Lessee is named the responsible party for funding the cost of mitigation for the life of the Project, and that mitigation includes any changes in survey design and sampling methodology that assure the continued utility of the survey data.

Comment Number: BOEM-2024-0008-0928-0009
Commenter Type: State Government
Organization: NJDEP

Comment Excerpt Text:

Mitigation will be required for impacts to the NJ Ocean Trawl (NJOT) by development of the ASOW North lease area. The NJOT has been operating since 1989 and surveys the waters of the outer continental shelf from Sandy Hook to Cape May, including much of the ASOW North lease area. See colocation of NJOT and ASOW North in Figure 1. Five times a year, MRA staff aboard the R/V Sea Wolf collect fish and invertebrates via a 30-meter bottom otter trawl. Fish are weighed, measured, and sampled for age and diet to inform fishery stock assessments and provide scientists with long-term population trend data. This survey is a critical tool in marine fish and fisheries management, and the data inform multiple coastwide stock assessments, including tautog, horseshoe crab, weakfish, bluefish, summer flounder, black sea bass, scup, butterfish, lobster, winter flounder, and striped bass. The survey is also leveraged to collect samples and data for 8-10 other research studies every year, including pioneering work in using environmental DNA for fisheries surveys. The NJOT's frequency and resolution of sampling is unique on the east coast; while the federal bottom trawl has some overlap with the NJOT, that survey is less frequent and has lower geographic resolution. The NJOT also provides environmental and ecological data that have been collected consistently for 35 years, data which might prove critical to distinguishing impacts from offshore wind and climate change.

Comment Number: BOEM-2024-0008-0951-0003
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

I think it's a travesty that the entire mid-Atlantic shore is being industrialized with wind turbines that have a finite life with no distinct plans on removal once they've outlived their lifespan. Obviously nothing has been learned from the abandoned oil rigs in the gulf.

Comment Number: BOEM-2024-0008-1007-0014
Commenter Type: State Government
Organization: New York State

Comment Excerpt Text:

e. Assess avoidance and minimization measures to reduce conflicts with siting, construction and/or operation of other facilities, including other offshore wind facilities, both permitted (e.g., Empire Wind) and planned, resilience projects (e.g., Living Breakwaters Project), transportation infrastructure, water-dependent recreational uses, and parkland.

Comment Number: BOEM-2024-0008-1029-0002
Commenter Type: Individual
Commenter: Douglas Crawford

Comment Excerpt Text:

Though your reviewers are adept at identifying numerous issues with the construction of offshore wind projects, there are no tough stances to ensure that these issues are indeed mitigated. The result appears to be the overlooking of potential dangers. In your past two New Jersey EIS efforts, the documents contain numerous MAJOR category impacts. Ocean Wind 1 FEIS contains 770 instances of the word "MAJOR," and Atlantic Shores 1 contains 366 instances. Spot- checking these instances in the PDF view reveals that most are material references to important impacts, not just incidental use of the word "major.

Comment Number: BOEM-2024-0008-1070-0100
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Require reporting and appropriate disposition of recovered fishing gear.
a) Report recovered fishing gear to NMFS and the relevant state agency. Consult with those agencies to arrange for the return or disposal of the gear at a suitable location, prioritizing the physical recycling of materials (as opposed to incineration).

Comment Number: BOEM-2024-0008-1070-0101
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Require transparent reporting of ensnarement and entanglement data.

a) All incidences of observed ensnarements of marine debris on floating offshore wind infrastructure and entanglements of marine life shall promptly be made publicly available.

Comment Number: BOEM-2024-0008-1070-0107
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Reducing environmental impacts of offshore wind energy on birds and other wildlife encompasses implementing three broad strategies. Each strategy can be distinguished by its primary emphasis, as follows: 1) optimal siting to avoid areas used by the most vulnerable bird populations; 2) temporal or structural alterations to energy infrastructure and operations that minimize avian impacts, and 3), establishing programs to compensate for those avian impacts that occur but that cannot be avoided otherwise. [Footnote 26: Kiesecker JM, Copeland H, Pocewicz A, McKenney B. 2010. Development by design: blending landscape-level planning with the mitigation hierarchy. Frontiers in Ecology and the Environment 8:261266; Arnett EB, May RF. 2016. Mitigating wind energy impacts on wildlife: approaches for multiple taxa. HumanWildlife Interactions 10:5; Croll DA, Ellis AA, Adams J, Cook AS, Garthe S, Goodale MW, Hall CS, Hazen E, Keitt BS, Kelsey EC, Leirness JB. 2022. Framework for assessing and mitigating the impacts of offshore wind energy development on marine birds. Biological Conservation 276:109795.] Although the three approaches typically involve separate methodologies and technical requirements, they may also be used jointly, and applied to either individual wind energy projects, or to cumulative assessments on complexes of wind farms.

Comment Number: BOEM-2024-0008-1070-0108
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

In the long run, optimal siting through marine spatial planning (MSP) provides the easiest, cheapest, and longest-lasting means to reduce wind energy impacts on birds. In a context of OWED, MSP applies ocean data sets to screen potential conflicts with existing ocean uses to identify the most suitable sea spaces. [Footnote 27: E.g., in California the specified agencies, stakeholders, state, local, and federal agencies, and the offshore wind energy industry collaborate to identify suitable sea space for wind energy areas in federal waters sufficient to accommodate the offshore wind planning goals for 2030 and 2045: https://cademo.net/wp-content/uploads/2022/11/CEC-OSW-Energy-Development-off-the-CA-Coast-1.pdf.] One of the advantages of MSP is that it makes explicit the tradeoffs in resource use and sector (i.e., the stakeholder group), [Footnote 28: White C, Halpern BS, Kappel CV. 2012. Ecosystem service tradeoff analysis reveals the value of marine spatial planning for multiple ocean uses. Proceedings of the National Academy of Sciences 109:4,6964,701.] even though doing so requires advanced spatial tools to evaluate such tradeoffs. [Footnote 29: Janen H, Gke C, Luttmann A. 2019. Knowledge integration in Marine Spatial Planning: a practitioners' view on decision support tools with special focus on Marxan. Ocean & Coastal Management 168:130138 https://doi.org/10.1016/j.ocecoaman.2018.11.006; Lombard AT, Ban NC, Smith JL, Lester SE, Sink KJ, Wood SA, Jacob AL, Kyriazi Z, Tingey R, Sims HE. 2019. Practical approaches and advances in spatial tools to achieve multi-objective marine spatial planning. Frontiers in Marine Science 6:166 https://doi.org/10.3389/fmars.2019.00166.] Optimal siting assessments broadly measure the severity of spatial conflicts likely to occur between wind power production and bird protection. [Footnote 30: Eichhorn M, Drechsler M. 2010. Spatial trade-offs between wind power production and bird collision avoidance in agricultural landscapes. Ecology and Society 15:10 http://www.ecologyandsociety.org/vol15/iss2/art10/.] Well-designed spatial suitability analyses can assist

marine planners to identify those sites wherein industrial needs for consistent supplies of offshore wind power overlap least with the critical marine habitats used by birds and other protected species. [Footnote 31: Best BD, Halpin PN. 2019. Minimizing wildlife impacts for offshore wind energy development: Winning tradeoffs for seabirds in space and cetaceans in time. PloS One 14:e0215722.] Reducing these avian risks through protection of high use areas is strengthened further when the spatial planning is conducted within a larger or national context. [Footnote 32: Balotari-Chiebao F, Santangeli A, Piirainen S, Byholm P. 2023. Wind energy expansion and birds: Identifying priority areas for impact avoidance at a national level. Biological Conservation 277:109851.]

[See original attachment for figure 3]
Figure 3. An example of avoidance for siting wind energy areas (WEAs) in the Gulf of Mexico. Here, data from 24 marine bird species collected during GoMMAPPS surveys (2017-2019) combined an aggregate habitat suitability layer in relation to various WEA options. Orange/yellow 'hot spots' represent high habitat suitability for birds therefore, less suitability for offshore wind development. The blue areas represent 'cold spots,' or low habitat suitability for birds, thus indicating areas are more suitable for offshore wind development. [Footnote 38: Figure 23, p. 34, in Memorandum: Request for Concurrence on Preliminary Wind Energy Areas for the Gulf of Mexico Area Identification Process Pursuant to 30 C.F.R. 585.211(b).

Comment Number: BOEM-2024-0008-1070-0109
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Small distances (10-25 km) can substantially lower (or raise) the spatial exposure risk of seabirds to offshore conservation hazards. [Footnote 33: Lee DS. 1999. Pelagic seabirds and the proposed exploration for fossil fuels off North Carolina: a test for conservation efforts of a vulnerable international resource. Journal of the Elisha Mitchell Scientific Society 115:294315.] For many marine birds, exposure risks vary by perpendicular distance from the coastline (Figure 3). In the Atlantic and Gulf of Mexico OCS regions, seabird aggregations generally peak in coastal inshore waters (0-25 km), then again at or just beyond the continental shelf edge. [Footnote 34: Goyert HF, et al. 2016. Predicting the offshore distribution and abundance of marine birds with a hierarchical community distance sampling model. Ecological Applications 26:1,7971,815; Winship AJ, et al. 2018. Modeling at-sea density of marine birds to support Atlantic marine renewable energy planning. OCS Study BOEM 2018-010S.] Spatial risks to seabirds during OWED can reach a nadir in some middle shelf waters due to vastly fewer numbers of birds inhabiting these less biologically productive marine habitats. [Footnote 35: Haney JC, Hemming JM, Tuttle P. 2019. Pelagic seabird density and vulnerability in the Gulf of Mexico to oiling from the Deepwater Horizon/MC- 252 spill. Environmental Monitoring and Assessment 191:110.] Even for individual species, the distribution pattern can be bimodal, with more individuals present in both nearshore and in far offshore waters, but becoming less abundant or even absent over the middle continental shelf. [Footnote 36: Kinlan BP, Winship, AJ, White TP, Christensen J. 2016. Modeling At-Sea Occurrence and Abundance of Marine Birds to Support Atlantic Marine Renewable Energy Planning: Phase I Report. U.S. Department of the Interior, Bureau of Ocean Energy Management, Office of Renewable Energy Programs, Sterling, VA. OCS Study BOEM 2016-039. xvii+113 pp. See, for example, the distribution pattern in the Mid-Atlantic region predicting annual average abundance for Northern Gannet, p. 102.] In the coastal upwelling system of the Pacific OCS region, however, seabird distributions can be more dispersed, or concentrated nearshore, [Footnote 37: Kelsey EC, Felis JJ, Czapanskiy M, Pereksta DM, Adams J. 2018. Collision and displacement vulnerability to offshore wind energy infrastructure among marine birds of the Pacific Outer Continental Shelf. Journal of Environmental Management 227:229247.] and thus not conform to the same extent with this bimodal pattern.

Comment Number: BOEM-2024-0008-1070-0114
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Collision is a primary concern for direct avian mortality from wind turbines. [Footnote 69: Loss et al. (2013) estimates that the average annual mortality rate for birds from turbines onshore is 3.58 birds/MW (95% C.I. = 3.054.68)
https://www.fws.gov/migratorybirds/pdf/management/lossetal2013windfacilities.pdf] Such impacts are estimated routinely at onshore wind facilities using carcass collection surveys, [Footnote 70: Smallwood KS. 2007. Estimating wind turbine-caused bird mortality. Journal of Wildlife Management 71:2,7812,791.] followed by adding expansion factors that account for undetected carcasses, time interval, size of the impacted area, wind turbine size and height, and other behavioral or environmental adjustments for estimating the mortality rate through modeling. [Footnote 71: Barrios L, Rodriguez A. 2004. Behavioural and environmental correlates of soaring-bird mortality at on-shore wind turbines. Journal of Applied Ecology 41:7281; Korner-Nievergelt F, Brinkmann R, Niermann I, Behr O. 2013. Estimating bat and bird mortality occurring at wind energy turbines from covariates and carcass searches using mixture models. PloS One 8:e67997; Choi DY, Wittig TW, Kluever BM. 2020. An evaluation of bird and bat mortality at wind turbines in the Northeastern United States. PLoS One 15:e0238034.] No truly comparable or direct methods exist to measure rates of collision in the offshore environment, however. Indeed, in a review of advanced technological systems used for operational monitoring of avian responses to offshore wind farms, not a single system measured empirical collision rates. [Footnote 72: Skov H, Heinnen S, Norman T, Ward R, Mndez S. 2018. ORJIP Bird avoidance behaviour and collision impact monitoring at offshore wind farms. The Carbon Trust: London, UK. 127 pp.] In general, it is believed that the species most vulnerable to collision risk are those whose distributions overlap with wind farms and do not avoid wind farms, that have a greater percentage of flight time within the rotor sweep zone, and that fly at night when visual acuity is reduced. Gulls and terns are predicted to be especially vulnerable to collision with wind turbines during foraging flights. [Footnote 73: Robinson Willmot et al.]

Collision risk models (CRM) are currently a primary means used to assess potential risk to some avian species. Newer variations of CRM are in development to incorporate 3-dimensional flight behavior to better predict the collision risk for seabirds and ESA-listed species. However, CRMs are simply predictions of avian risk, and none of the models have been verified for their accuracy in the marine environment. Documenting collision events in the offshore environment will be an important part of verifying CRMs for monitoring programs in the offshore environment.

Comment Number: BOEM-2024-0008-1070-0115
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Assessments should include a collision risk analysis on species that occur within a 20-km radius of the WEA and that trigger conservation obligations: ESA-listed endangered and threatened species, state-listed threatened, endangered, and species of concern, and IUCN listed endangered, threatened, and near threatened. Assessments should include the most recently available scientific information.

Although collision events during migration are likely to occur less frequently, these episodic events have the potential to have large, population-level consequences during a short time. This cumulative risk must be analyzed, as the likelihood of large migratory collision events will rise as the total area of offshore wind footprint increases.

Comment Number: BOEM-2024-0008-1070-0116
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Collision risks to nocturnal migrants within a given area must be sufficiently assessed. Migration events are relatively infrequent, and therefore, survey transects are not appropriate for characterizing collision risk to nocturnal migrants. Assessments must consider migration timing, variations in flight height, and the distance from shore at which nocturnal migrants reach maximum migration height. In general, efforts to understand these impacts should rely on a combination of radar, telemetry, survey, and acoustic monitoring, and should not be based on any single technology alone.

When incorporating radio-telemetry methods, receiving stations need to be installed in the offshore environment, in such a way that avian movement in and around the WEAs can be adequately assessed. [Footnote 74: Monitoring protocols for automated radio telemetry are currently in development by NYSERDA and USFWS. Williams K, Adams E, Gilbert A. (n.d.). USFWS Migratory Birds: Pam Loring, Scott Johnston Univ. of Rhode Island: Peter Paton:21. Accessed at: https://briwildlife.org/wp-content/uploads/2021/09/NYSERDA-PAC-Webinar-Radio-Telemetry-20200826_Final.pdf] Financial support is needed to further this technology.

Acoustic monitoring is inappropriate on its own to characterize communities of nocturnal migrants within WEAs as many of the most abundant nocturnal migrant groups do not emit nocturnal flight calls, and therefore, would not be accounted for using acoustic monitoring. [Footnote 75: Evans WR, Rosenberg KV. 2000. Strategies for bird conservation: The Partners in Flight planning process. Proceedings of the 3rd Partners in Flight Workshop, 1995 October 1-5, Cape May, NJ.] Additionally, acoustic monitoring does not adequately assess flux a necessary value for assessing collision risk and estimating population-level impacts.

Comment Number: BOEM-2024-0008-1070-0117
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

A full picture of migratory pathways for songbirds and shorebirds should be produced. This could be realized with the addition of satellite tracking information from Movebank, [Footnote 76: https://www.datarepository.movebank.org/] and the National Aeronautics and Space Administration's Icarus project [Footnote 77: https://nasa.github.io/icarous/] for larger bodied shorebirds. Additional research and tagging of priority bird species can rely on radio and satellite telemetry technology as appropriate, including the expansion of the radio telemetry receiver network in the offshore environment.

Comment Number: BOEM-2024-0008-1070-0118
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Collision risk to seabirds must be adequately addressed. This must include an analysis, using the best available science, of flight heights (averages and ranges), avoidance rates, and other relevant avian flight behaviors. Consideration must be given to the range of turbine specifications that could influence collision risk, including factoring in such parameters as the air gap, total rotor swept zone, and turbine height.

Transparency is essential in presenting the high level of uncertainty in the risk assessment, including high and low estimates for population-level cumulative impacts. Much of the high uncertainty in these models is a result of highly variable concentrations of seabirds throughout the year.

Special care will need to be taken in factoring in the very high uncertainty surrounding the collision risks posed to procellariiform seabirds (shearwaters, petrels, albatrosses). [Footnote 78: Deakin Z, Cook A, Daunt F, McCluskie A, Morley N, Witcutt E, Wright L, Bolton M. 2022. A review to inform the assessment of the risk of collision and displacement in petrels and shearwaters from offshore wind developments in Scotland. Scottish Government: Riaghaltas na h-Alba. ISBN: 978-1- 80525-029-6 (web only) https://www.researchgate.net/profile/Zoe-Deakin-2/publication/366139542_A_review_to_inform_the_assessment_of_the_risk_of_collision_and_displacement_in_petrels_and_shearwaters_from_of fshore_wind_developments_in_Scotland/links/6393231e484e65005bf86842/A-review-to-inform-the-assessment-of-the-risk-of-collision-and- displacement-in-petrels-and-shearwaters-from-offshore-wind-developments-in-Scotland.pdf] Given the lack of comparable studies in Europe for which inferences might be drawn, for example, these seabirds (many of which are highly endangered) should be a particular focus for research using movement ecology methods.

Comment Number: BOEM-2024-0008-1070-0119
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

While limited, CRMs are one of the only tools available to hypothesize potential impacts to birds from collision in the offshore environment. As such, CRMs provide a mechanism for testing outcomes (e.g., observed collision rates) against the model predictions (e.g., expected collision rates). These models are extremely sensitive to input parameters. A study by Cook et al. (2014) found that estimations of avoidance and collision risk from Band models were highly sensitive to the flux rate (total number of birds passing through the wind farm), corpse detection rate, rotor speed, and bird speed. Factors such as weather (i.e., wind speed and visibility) and habitat use will also affect the accuracy of these estimates, as such factors would greatly influence avian flight patterns and behavior. [Footnote 79: Cook ASCP. 2014. The avoidance rates of collision between birds and offshore turbines. British Trust for Ornithology Research Report No. 656.] Therefore, collision risk analyses using CRMs should include the inputs used in the analysis for public comment and transparency. Providing CRM results without transparency to the inputs and analytical process would never be acceptable from a scientific perspective. Details regarding inputs should include, but not be limited to, avoidance behavior, flight height, flight activity, flux rate, corpse detection rate, rotor speed, bird speed, and collision risk.

Additionally, use of CRMs should consider seasonal and daily conditions that influence avian flight height, following Band's recommendations:

"For some species typical flight heights are dependent on the season, and in such a case it will be best to use seasonally dependent typical flight heights in assessing collision risk for each month, rather than average flight heights across the year...Flight activity estimates should allow both for daytime and night-time activity. Daytime activity should be based on field surveys. Night-time flight activity should be based if possible on nighttime survey; if not on expert assessment of likely levels of nocturnal activity...collision model[s] should take both day and night flights into account. Where there is no night-time survey data available, or other records of nocturnal activity, for the species in question (or for other sites if not at this site), it should be assumed that the Garthe and Hppop/ King et al. 1-5 rankings apply. These rankings should then be translated to levels of activity at night which are respectively 0%, 25%, 50%, 75% and 100% of daytime activity. These percentages are a simple way of quantifying the rankings

for use in collision modelling, and they may to some extent be precautionary." [Footnote 80: Band B. 2012. Using a collision risk model to assess bird collision risks for offshore windfarms. Strategic Ornithological Support Service.]

The Acoustic and Thermographic Offshore Monitoring (ATOM) System deployed on pilot turbines at the Coastal Virginia Offshore Wind (CVOW) project could help inform these conditional flight heights if the system is further deployed to cover larger spatial and temporal scales. New derivations of the Band model are also currently under development, namely the 3-D collision risk model (CRM) for seabirds by the Schatz Energy Research Center, [Footnote 81: Shatz Energy Research Center. 2020. Seabird Distribution in 3D: Assessing Risk from Offshore Wind Energy Generation, Humboldt State University. https://schatzcenter.org/2020/04/seabird3dstudy/] and a stochastic CRM specific to ESA-listed species in southern New England from the University of Rhode Island. [Footnote 82: E.g., see: https://briwildlife.org/scram/] Such models should be applied, once available, in BOEM's assessments of avian impacts for offshore wind developments, as they will be better able to incorporate variation in the input parameters.

Collision risk models provide a starting point, not an end point, from which to predict cumulative, population-level impacts across wind farms in OCS regions. Collision risk models are of largely unknown accuracy in predicting actual mortality, however:

"Siting and permitting decisions for many European offshore wind facilities are informed by collision risk models, which have been created to predict the number of avian collisions for offshore wind energy facilities. However, these models are highly sensitive to uncertainties in input data. The few empirical studies at land-based wind facilities that have compared model- estimated collision risk to actual mortality rates found only a weak relationship between the two, and due to logistical difficulties, the accuracy of these models has not been evaluated in the offshore environment." [Footnote 83: Allison TD, Diffendorfer JE, Baerwald EF, Beston JA, Drake D, Hale AM, Hein CD, Huso MM, Loss SR, Lovich JE, Strickland MD. 2019. Impacts to wildlife of wind energy siting and operation in the United States. Issues in Ecology 21:218.]

Investments should be made for studies to not only verify CRM utility in the offshore environment but should also move toward viable collision detection requirements for lease holders and future offshore wind developments.

Comment Number: BOEM-2024-0008-1070-0123
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

To provide more certainty of compliance with bird protection measures, offshore wind energy projects should use adaptive management practices for birds and collect "sufficiently robust" data to inform mitigation strategies to avoid and minimize adverse impacts. Robust data cannot be limited to 1-3 years of monitoring. Rather, such assessment needs to be carried out over longer terms.
According to FWS Wind Turbine Guidelines (2012), [Footnote 95: USFWS. 2012. U.S. Fish and Wildlife Service Land-Based Wind Energy Guidelines, p. 8. Available at https://www.fws.gov/ecological-services/es- library/pdfs/WEG_final.pdf] DOI has adopted the National Research Council's 2004 definition of adaptive management, which states:

Adaptive management promotes flexible decision-making that can be adjusted in the face of uncertainties as outcomes from management actions and other events become better understood. Careful monitoring of these outcomes both advances scientific understanding and helps adjust policies or operations as part of

an iterative learning process. Adaptive management also recognizes the importance of natural variability in contributing to ecological resilience and productivity. It is not a 'trial and error' process, but rather emphasizes learning while doing. Adaptive management does not represent an end in itself, but rather a means to more effective decisions and enhanced benefits. Its true measure is in how well it helps meet environmental, social, and economic goals, increases scientific knowledge, and reduces tensions among stakeholders.

Comment Number: BOEM-2024-0008-1070-0124
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

BMPs for Displacement During Construction

Construction should exercise caution during cable laying. Projects should avoid near-shore cable laying during low tide during periods of nesting, staging, and migration (e.g., between mid-July and mid-September in southern New England) to minimize disturbing species like Common Terns (Sterna hirundo) and ESA-listed endangered Roseate Terns (S. dougallii). Projects should also avoid installation of export cable conduits during the nesting season (e.g., from April 1 to August 31 in southern Massachusetts) to avoid disrupting beach-nesting birds, e.g., ESA-listed threatened Piping Plover (Charadrius melodus) and MA-listed Least Terns (Sternula antillarum) in Massachusetts. If beach-nesting birds choose to nest in the area, then construction either needs to halt or avian construction monitors need to be hired to prevent mortality of chicks within 1000 m of the construction site.

Comment Number: BOEM-2024-0008-1070-0125
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

BMPs for Disturbance from Construction Vessel Traffic

As feasible and relevant, developers should take care to minimize disruption in and to avian core use areas, including the interval September 1 to March 1 to reduce impacts to denser concentrations of wintering marine birds.

Comment Number: BOEM-2024-0008-1070-0126
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

BMPs for Reducing Turbine Attraction

Federal Aviation Administration (FAA)-compliant lighting should be employed that reduces attraction of nocturnal migrants and nocturnal foraging seabirds. NEXRAD RADAR systems have been successfully used to activate navigation lighting only upon approaching aviation. Aircraft Detection Lighting Systems (ADLS) are also currently in use at onshore wind projects in the U.S. We recommend this or similar systems. Anti-perching devices should be integrated on the turbines to avoid attracting birds in the marine environment. Deploying MERLIN radar or similar early warning systems at the wind farm can alert operators to approaching migratory and individual birds under mortality risk conditions to automatically

implement minimization responses, including temporary idling of turbines. As described below, we recognize these systems may not be readily available for the offshore wind environment, but we expect projects to allow for deployment of these technologies when available.

Comment Number: BOEM-2024-0008-1070-0127
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

BMP for Collision Monitoring

In isolation, collecting bird carcasses is an inadequate method for estimating collisions in the offshore environment. Collision monitoring will need to use technology from which we can rapidly learn the key variables that contribute to collision risk and adjust management accordingly, including informed curtailment strategies as necessary. A framework for adaptive management should include operational adjustments that are reasonable and cost effective, and include advances in detection and avoidance technology. For example, the adaptive management framework should include smart curtailment to contain reasonable losses of energy production, seasonal adjustments based on mortality data as needed to compare with defined thresholds, and other operations that are proven to be effective in case of a rare event of mortality of a significant species or number of birds. These are practices already in use for adaptive management at some onshore wind facilities and in European Union offshore wind facilities. Their incorporation into the leasing process early will permit BOEM to require their adoption as new technologies become available.

Comment Number: BOEM-2024-0008-1070-0128
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Mitigation should be used whenever there is potential to offset adverse impacts of wind energy development that are otherwise unavoidable. Given current technology, there are no viable options for effectively minimizing the impacts of developing areas necessary to protect birds from all harmful and long-term impacts. Furthermore, migratory birds face significant conservation challenges, as many originate from other regions. Thus, the actions necessary to increase their populations require significant investment of time and resources. The breadth of species that are potentially affected, and the migratory nature of these species, will require environmental mitigation.

Mitigation more effectively offsets impacts when conducted on a project at population-specific scale. This approach is encouraged for offshore wind energy development impacts. However, if a project- by-project approach proves difficult to make operational in practice, a mitigation habitat or population fund could be developed and administered by trustees of federal agencies. Following the model used in some other forms of development, this approach would most appropriately be funded by developers whose actions result in the impacts, and for whom some level of regularly assurances would enable also meeting the nation's renewable energy goals. Funding amounts could be based on estimated likely or actual mortalities.

Quantifying mitigation values for birds should initially be based on a generous estimate of the number of birds that could be killed in collisions with turbines, including but not limited to ESA listed species, nocturnal migrants, and birds of conservation concern. [Footnote 96: Exemplary consideration of all sensitive birds exposed to offshore components of a project is including state-listed species in conjunction

with the Empire Wind DEIS; Table 2-9 in Biodiversity Research Institute. 2022. Avian Impact Assessment for the Proposed Empire Offshore Wind: Empire Wind Project (EW 1 and EW 2) in the New York Bight: Lease Area OCS-A-0512, Portland, ME, pp. 4648.] Evaluating the mitigation to offset these losses should utilize resource equivalency analysis, which accounts for the fact that birds at different life stages are not functionally equal in conservation importance (e.g., one additional hatchling does not functionally replace a breeding adult bird). This same approach has been used extensively for addressing bird losses resulting from marine oil spills and contaminants. [Footnote 97: For example, under NEPA, the Damage Assessment and Restoration Plan/Environmental Assessment for the Luckenbach Spill called for several mitigation projects to compensate for the losses of migratory birds in distant countries where those species originate, such as Mexico, Canada and New Zealand, in the amount of $21M. Luckenbach Trustee Council. 2006. S.S. Jacob Luckenbach and Associated Mystery Oil Spills Final Damage Assessment and Restoration Plan/Environmental Assessment. Prepared by California Department of Fish and Game, National Oceanic and Atmospheric Administration, United States Fish and Wildlife Service, National Park Service.] Mortalities and supporting analyses should be reevaluated as collision-monitoring data becomes available, and additional mitigation provided as necessary.

Comment Number: BOEM-2024-0008-1070-0129
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Seabirds are long lived with delayed maturity and low fecundity. This life history strategy means that adult survival is the main driver of population change. Mortality from offshore wind energy development is likely additive and, if skewed to breeding adults or even sub-adults, this age-skewed mortality will likely have a greater potential to drive declines in population trajectories. Unique life- history traits of seabirds require a substantial long-term commitment to reach the offset needed.
Given that mitigation is time-consuming from concept to successful implementation, we urge the developers and agencies to commit to this and initiate action as soon as possible.

For mitigation programs aimed at seabirds, direct restoration management activities that augment populations may include the translocation of chicks to establish new colonies at different locations, [Footnote 98: Priddel D, Carlile N. 2001. A trial translocation of Gould's Petrel (Pterodroma leucoptera leucoptera). Emu 101:7988; Miskelly CM, Taylor GA, Gummer H, Williams R. 2009. Translocations of eight species of burrow-nesting seabirds (genera Pterodroma, Pelecanoides, Pachyptila and Puffinus: Family Procellariidae). Biological Conservation 142:19651980; Sagar RL, Leseberg A, Hunt K, Nakagawa K, Dunphy B, Rayner MJ. 2015. Optimising translocation efforts of Mottled Petrels (Pterodroma inexpectata): growth, provisioning, meal size and the efficacy of an artificial diet for chicks. Emu-Austral Ornithology 115:137145; Carlile N, Priddel D, Madeiros J. 2021. Establishment of a new, secure colony of Endangered Bermuda Petrel Pterodroma cahow by translocation of near-fledged nestlings. Bird Conservation International 22:4658.] construction of artificial nests and burrows to increase breeding population size, [Footnote 99: Priddel D, Carlile N, Wheeler R. 2006. Establishment of a new breeding colony of Gould's petrel (Pterodroma leucoptera leucoptera) through the creation of artificial nesting habitat and the translocation of nestlings. Biological Conservation 128:553563.] protection of breeding sites by wardens, [Footnote 100: Anderson DW, Keith JO. 1980. The human influence on seabird nesting success: conservation implications. Biological Conservation 18:6580.] and eradication or other control measures aimed at nest predators. [Footnote 101: Cruz JB, Cruz F. 1996. Conservation of the Dark-rumped Petrel Pterodroma phaeopygia of the Galpagos Islands, 19821991. Bird Conservation International 6:2332; Hodges CN, Nagata RJ, Jr. 2001. Effects of predator control on the survival and breeding success of the endangered Hawaiian Dark-rumped Petrel. Studies in Avian Biology 22:308318; Brooke MD, O'Connell TC, Wingate D, Madeiros J, Hilton GM, Ratcliffe N. 2010. Potential

for rat predation to cause decline of the globally threatened Henderson petrel Pterodroma atrata: evidence from the field, stable isotopes and population modelling. Endangered Species Research 11:4759.] Restoration management for seabirds should bear in mind that the most beneficial recovery actions typically involve the control or outright elimination of non-native predators at breeding sites. [Footnote 102: O'Dwyer T, Carlile N, O'Neill L, Halpin LR. 2022. Changing fortunes of the Black-winged Petrel Pterodroma nigripennis following the Lord Howe Island Rodent Eradication Project-interactions with other recovering species. Bird Conservation International 9:1-11; Priddel D, Carlile N, Wheeler R. 2000. Eradication of European Rabbits (Oryctolagus cuniculus) from Cabbage Tree Island, NSW, Australia, to protect the breeding habitat of Gould's Petrel (Pterodroma leucoptera leucoptera). Biological Conservation 94:115125; Carlile DP, Zino F, Natividad C, Wingate DB. 2003. A review of four successful recovery programmes for threatened sub-tropical petrels. Marine Ornithology 31:185192.] Provision of safe artificial nest sites is an additional known successful strategy. [Footnote 103: Madeiros J, Carlile N, Priddel D. 2012. Breeding biology and population increase of the Endangered Bermuda Petrel Pterodroma cahow. Bird Conservation International 22:3545; Gummer H, Taylor G, Wilson KJ, Rayner MJ. 2015. Recovery of the endangered Chatham petrel (Pterodroma axillaris): a review of conservation management techniques from 1990 to 2010. Global Ecology and Conservation 3:310323.] Recovery actions are usually more difficult to implement for widespread species on larger islands, [Footnote 104: Wheeler J, Satg Y, Brown A, Goetz J, Keitt B, Nevins H, Rupp E. 2021. Black-capped Petrel (Pterodroma hasitata) Conservation Update and Action Plan: Conserving the Diablotin. International Black-capped Petrel Conservation Group, BirdsCaribbean. Available at: https://www.birdscaribbean.org/wp-content/uploads/2021/10/2021-Black-capped-Petrel-Conservation-Update-and-Plan.pdf. Strategies to recovery this species include reducing pressure from predators, reducing collisions and groundings, and supporting community development in villages near nesting sites.] and thus can be expected to take longer to implement. If recovery management research is limited or absent for a particular species, the practices for augmenting populations can be borrowed from techniques that have been applied successfully to other species in the same genus.

Comment Number: BOEM-2024-0008-1070-0130
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Collision Monitoring

Post-construction fatality monitoring onshore is a key component of Tier 4 of the USFWS Land- Based Wind Energy Guidelines. [Footnote 105: USFWS. 2012. U.S. Fish & Wildlife Service Land-based Wind Energy Guidelines https://www.fws.gov/ecologicalservices/es-library/pdfs/WEG final.pdf [hereinafter "USFWS Land-Based Wind Energy Guidelines"]] Many wind development projects onshore conduct post- construction monitoring, especially on public lands managed by the Bureau of Land Management. Developers survey for carcasses around a radius from the turbines, under an a priori protocol, to determine avian mortality rates. The data are adjusted for searcher efficiency, carcass persistence, and other sources of detection bias.

Carcass search protocols are entirely impractical at sea for obvious reasons; however, this limitation does not relieve BOEM from requiring post-construction fatality monitoringan obligation that the onshore wind industry has committed to and is required to fulfill. There is ongoing, rapid development of imaging and bird strike technologies used in the European Union and the United Kingdom, and such technologies are also being developed in the United States. Grant funding from the DOE Office of Energy Efficiency and Renewable Energy, state energy agencies, and others supports technical and economic advancement of offshore and onshore wind. The DOE Wind Energy Technologies Office invests in energy science research and development that enables innovations needed to advance wind systems, reduce the cost of

electricity, and accelerate the deployment of wind power.

Comment Number: BOEM-2024-0008-1070-0131
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

DOE has recently funded development of collision detection technology from the Albertani Lab [Footnote 106: Clocker K, Hu C, Roadman J, Albertani R, Johnston ML. 2022. Autonomous sensor system for wind turbine blade collision detection. IEEE Sensors Journal 22:11,382-11,392. DOI: 10.1109/JSEN.2021.3081533] at Oregon State University and WT Bird from WEST, Inc. [Footnote 107: Verhoef JP, Eecen PJ, Nijdam RJ, Korterink H, Scholtens HH. 2004. A Low Cost Solution for Detecting Bird Collisions. ECN-C--04-046. https://tethys.pnnl.gov/sites/default/files/publications/Verhoef-2204.pdf] Similar technologies are being tested at Block Island Wind Project and other offshore locations in the European Union and United Kingdom and are making rapid gains as effective, officially verified, commercially available, and affordable technologies at scale in the near future (Figure 8), possibly at the same time projects become ready for construction and operation. [Footnote 108: Dirksen S. 2017. Review of methods and techniques for field validation of collision rates and avoidance amongst birds and bats at offshore wind turbines. Sjoerd Dirksen Ecology Report Number SjDE 17. DOI: 10.13140/RG.2.2.15547.41766] However, these technologies must be fully integrated into turbine design before they can be widely deployed.

Comment Number: BOEM-2024-0008-1070-0132
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

DOE is currently evaluating the development status of these integrated systems based on their readiness for offshore wind deployment. [Footnote 110: Brown-Saracino J. 2018. Technologies and Approaches for Monitoring Bird and Bat Collisions Offshore (Presentation to the State of the Science Workshop on Wildlife and Offshore Wind Energy Development). https://www.nyetwg.com/_files/ugd/78f0c4_146cbbe010dc493db11cb6a90d43be94.pdf?index=true] BOEM and industry should support development of such combined technologies, and regulators should require turbine developers to integrate these systems into their turbine designs. Instead of waiting for offshore wind project developers to drive the market, BOEM must require collision monitoring and work with the industry to support the development and deployment of these new technologies.

Incorporation of these advanced monitoring technologies, hopefully standardized, should be a required element in the post-construction monitoring plan for offshore wind energy projects. Regulators should require standardized methodology for using such new technologies across all projects in U.S. waters to: (1) incorporate mortality data, and where relevant displacement data, into ongoing cumulative effects assessments and adaptive management strategies; (2) validate collision risk models; and (3) measure impacts on ESA-listed species and other species of conservation obligation by augmenting tracking data with data from on-site detection technology.

BOEM has suggested that mortality monitoring rely on carcass monitoring around the bases of offshore wind turbines. This is contrary to the standard protocols in post-construction monitoring for onshore wind projects, where a radius from the turbine is prescribed as the search area and includes distances where birds may be propelled or thrown from the actual turbine structure and blades after collision. Offshore structures anticipated for installation have very little available structure on which any dead or injured

birds could land.

Defining the turbine platform and vessels as the relevant search area is inadequate. Only updated technology can detect bird strikes or mortalities in the appropriate range established by onshore post-construction mortality studies. The shared costs of development and implementation of these technologies across all lessees and with BOEM, if standardized, would avoid an undue economic burden on individual projects. Additionally, regulators should require that lease applicants report mortality events promptly and publicly.

Comment Number: BOEM-2024-0008-1070-0133
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

In summary, collision monitoring should include: (1) Development of collision detection technologies must be advanced and integrated into turbine designs; (2) Methodology for using new collision detection technologies should be standardized across all projects to incorporate mortality data, and possibly displacement data, into ongoing cumulative effects analyses and adaptive management strategies, to validate collision risk models, and to measure impacts on ESA listed species and species of conservation obligation by augmenting tracking data with data from on-site detection technology; and (3) Requirements on lease applicants to report mortality events promptly and publicly.

Comment Number: BOEM-2024-0008-1070-0134
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Tracking Avian Movements Using Telemetry (Radio or Satellite)

Tracking can help address several knowledge gaps regarding avian interactions (i.e., barrier effects, habitat loss, and collision) with wind farms. Changes to patterns in migration routes (barrier effects) and spatial distributions (habitat loss) can inform the degree of displacement, while technologies that can track fine scale flight behaviors can help study how birds maneuver within the wind farm itself.

Using nanotags on trans-oceanic passerine migrants during spring and fall migration would help to inform species-specific migratory routes, flight heights, and timing of migration, and would add detail to our understanding of the risk to migrating passerines. At the same time, using satellite or GPS technology to track seabirds present near wind energy areas throughout the year can help to elucidate effects of offshore wind development Finally, tracking studies can help to address the cumulative and population-level impacts of exposure to wind energy areas across all exposed species.

We suggest tracking studies that consider the following elements:

a. Installation of Automated Radio Telemetry Receivers

Motus receivers can be placed throughout the turbine array to detect nano-tagged individuals and estimate flight height and direction throughout the array, as well as within a buffer zone on all sides of the array. Alternative receivers or tag readers may also be considered, but in all cases the receivers should be placed to detect flight height, species, time, and direction of flight. Data downloads should be automated. Motus receivers require specialized maintenance that may require allowing biologists to access sites for maintenance or training developers to perform maintenance themselves. The costs and logistics of this routine maintenance should be anticipated when installing towers. At present floating Motus towers are

being tested. Incorporating this technology into project construction would facilitate gathering baseline movement data for small-bodied species that cannot take larger tagging technology.
b. Funding Priorities for At-Risk Species

Funding for the purchase and deployment (and satellite time as necessary) of wildlife tracking tags should be a top priority for at-risk species. Species should be chosen in consultation with experts to prioritize species that are ESA-listed, that are of high conservation concern, that are of high likelihood of exposure to the area, and that are feasible to capture. This consultation may include but is not necessarily limited to: (1) automated radio telemetry nanotags for smaller species like Roseate Tern, Piping Plover, and those nocturnal migrants for which this technology is appropriate; (2) GPS satellite tags for larger at-risk species like Northern Gannet and Common Loon (Gavia immer); and (3) geolocators and altimeters, or similar technology, for nocturnally migrating passerines for which nanotag technology cannot be applied at present. While the resolution of such technologies is not sufficient to determine overlap with WEAs, geolocators can help to elucidate general migration routes and identify potential species of concern for further monitoring.

Tags should be deployed on a representative sample of target populations for two years prior to construction as well as two years post-construction, so that comparisons can be made between movement patterns and habitat use before and after construction. For species whose migration routes are variable or poorly known, transmitters should be distributed across multiple breeding or migration sites throughout the range of the species. In some cases, seabirds wintering in or migrating through the area may be captured at-sea. Many seabird and shorebird species are most accessible while attending terrestrial nest sites, however, which may be located far from the target area (e.g., Canada, the Caribbean). Multi-national partnerships and coordination across sites may be required to access and monitor these species.

Tagging should target not only a variety of species (discussed above) but also different sexes and age classes, since males may segregate from females during non-breeding, and dispersing juveniles may differ from adults in their presence or behaviors around wind energy facilities. Dispersing juveniles can often be captured at nest sites shortly before they become capable of flight. However, mortality is often high in dispersing juveniles, meaning that larger sample sizes may be required for juveniles than for adults.All data should be publicly available as soon as possible after collection to facilitate coordination among planning areas and studies (this applies to all monitoring data). Public repositories such as movebank.org could be used to share satellite/GPS tracking data in real time via automatic updates. Motus data requires extensive cleaning and quality control. Thus, providing for data curation should be considered when applying these technologies.

Comment Number: BOEM-2024-0008-1070-0135
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

To detect differences in avian distribution pre- and post-construction, surveys should be designed to account for detection bias, cover the lease area and its surroundings, and collect high-resolution data. We recommend employing high definition still or video aerial surveys, following the protocols described by Thaxter and Burton, and Williams and colleagues, [Footnote 111: Thaxter CB, Burton NH. 2009. High definition imagery for surveying seabirds and marine mammals: a review of recent trials and development of protocols. https://tethys.pnnl.gov/sites/default/files/publications/Thaxter-Burton-2009.pdf; Williams KA, Stenhouse IJ, Adams EM, Connelly EE, Gilbert AT, Duron M. 2015. Integrating novel and historical survey methods: a comparison of standardized boat-based and digital video aerial surveys for marine wildlife in the United States https://briwildlife.org/wp-content/uploads/2021/08/MABS-Project-Chapter-13-Williams-et-al-2015.pdf.] with survey designs like those used by Winiarski and colleagues. [Footnote

112: Winiarski KJ, Burt ML, Rexstad E, Miller DL, Trocki CL, Paton PW, McWilliams SR. 2014. Integrating aerial and ship surveys of marine birds into a combined density surface model: A case study of wintering Common Loons. The Condor: Ornithological Applications 116:149161.]

We recommend several specific parameters for digital aerial surveys. Project study areas should include a minimum buffer of at least 20 km around lease and construction areas. Aerial transects are to be spaced 3 km apart and cover the entire study area. Flights are conducted at an altitude of 500- 650 m above mean sea level at a constant speed of 185 km/h, or a flight altitude and speed that can safely navigate the WDA while accurately attributing birds to species and/or taxonomic sub-group. GPS technology is used on the plane, allowing for at least 2 m accuracy for bird observations. To the extent possible, surveys are repeated three times within each sampling window, with survey windows scattered throughout the year. Survey protocols are repeated for consecutive years before and after construction, covering a minimum of two years pre-construction, and two years post- construction. Lastly, analysis should account for differences in detection probability based on species, flight height, and environmental factors and models.

Vessel surveys and other data (see below) will be necessary to supplement aerial surveys until digital surveys are verified to collect high enough resolution data to distinguish between similar species, especially when sensitive species are involved.

Comment Number: BOEM-2024-0008-1070-0136
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

In many cases, aerial surveys are unable to consistently distinguish between species within closely related groups (e.g., Common Terns from Roseate Terns). Given the endangered status and the relatively high collision risk of Roseate Terns, [Footnote 113: Robinson Willmott JC, Forcey G, Kent A. 2013. The relative vulnerability of migratory bird species to offshore wind energy projects on the Atlantic Outer Continental Shelf: An assessment method and database. Final Report. BOEM, Office of Renewable Energy Programs. OCS Study BOEM 2013 207.] it is vital that offshore wind energy projects supplement aerial surveys with vessel-based surveys during pre- and post-construction phases to evaluate these species-specific displacement effects. Survey methods should also be integrated effectively. [Footnote 114: Williams et al. 2013; Winiarski et al. 2014.] Vessel surveys should be used to supplement digital aerial surveys for continuity in cases in which pre-construction surveys relied on vessel and non-digital aerial surveys. Vessel surveys and telemetry data also will be necessary to supplement aerial surveys until digital surveys are verified to collect high enough resolution data to distinguish between similar species, especially when sensitive species are involved.

Comment Number: BOEM-2024-0008-1070-0138
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Pre- and Post-construction Demographic Monitoring

While spatial data will help to determine whether displacement is occurring, it may not explicitly capture whether such changes in spatial distribution and movement patterns result in negative consequences to individuals or populations (i.e., changes in population vital rates). We suggest that spatial monitoring efforts (e.g., transect surveys, telemetry, and radar) be paired with efforts to monitor demographics, diet, and body condition for those species most likely to be impacted by displacement and barrier effects.

Demographic monitoring can include productivity monitoring for beach nesting birds. Diet studies may be appropriate within waterbird colonies, or monitoring at key staging sites. Stable isotope analysis can help identify changes in diet quality for various ages and times of year. Mark-recapture studies will help identify changes in survival rates for juveniles and adults. Physiological measurements, including stress hormones, body condition, and hematology, may serve as excellent proxies for population vital rates in near term.

Comment Number: BOEM-2024-0008-1070-0139
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Migration Monitoring with Vertical Marine Radar

Onshore wind projects can detect nocturnal migratory bird movement using vertical marine radar. The most important data collected with this technology is magnitude (i.e., flux), timing, and altitude of the moving birds, with comparisons with synoptic weather data. This is a significant data need for all wind development areas (WDAs) in both the Atlantic and Gulf OCS call areas. We suggest that marine radar be installed and activated as soon as possible prior to construction using a platform or buoy to obtain baseline data. For cases in which marine radar cannot be installed prior to construction, we recommend radar to be incorporated on existing structures turbine platforms to inform smart curtailment strategies.

Comment Number: BOEM-2024-0008-1070-0140
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Integrated Monitoring for Avian Collision and Avoidance Behaviors

A comprehensive review of 26 studies completed, currently underway, or planned, and that used various technologies or combinations of technologies, indicated some real promise but also profound gaps in the avian monitoring systems available for deployment at offshore wind farms. [Footnote 118: Skov et al. 2018.] A majority of operational monitoring studies that use such technological systems are designed to further understand avoidance and flight behaviour at different scales (micro-, meso- and macro-), or to implement mitigating actions to avoid or minimize the occurrence of collisions. Yet as of 2018, not a single system had the inherent capability to measure the empirical collision rate. [Footnote 119: Ibid., p. 97.] This is arguably the most vital metric to collect in assessing demographic impacts on birds from OWED.
"In order to obtain empirical collision rates, instances of collisions must be detected over a given period of time and with a known degree of confidence (i.e., an understanding of false negative rate). It is necessary for a monitoring system to provide information on periods when no collisions occur but birds are detected within close proximity to the turbine blades in order to understand collision rates in the context of flux. It is also necessary to have the capability to identify species and as such, the incorporation of cameras is required to observe the birds at risk, while acoustic technology may also aid identification in low-light conditions." [Footnote 120: Ibid.]

In order to fully evaluate impacts to birds from offshore wind farms, integration of multiple technologies will be necessary in measure four key variables: (1) collision, (2) micro-avoidance behavior, (3) meso-avoidance behavior, and (4) macro-avoidance behavior. With all of these variables in hand, it should be possible to comprehensively estimate the impacts to birds from OWED. The ideal integrated monitoring

system would need to encompass such diverse components as radar (horizontal and vertical), cameras (still, video, and themographic), biologging or geo-tracking devices, acoustic identification, and collision detection.

"[This] review reveals that a combined monitoring strategy that includes some type of radar device (allowing data on the meso and macro-scale as well as information on flux rates to be gathered), camera or visual observation (allowing birds within the meso and micro zone to be monitored and can allow species identification to take place) and impact detection technology (allowing for collision events to be recorded with some degree of certainty) could generate the best results. Additionally microphones may be used to aid with species identification and bio- logging devices could provide contextual information (i.e., the origin of the bird, relative amounts of time spent within and outside wind farms and seasonal changes in behaviours) and show how habitat use and behaviour towards the wind farm changes overtime." [Footnote 121: Ibid., p. 99.]

Comment Number: BOEM-2024-0008-1070-0145
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Determining risk and adaptively managing to avoid and minimize impacts relies on monitoring. Pre-construction monitoring, such as acoustic monitoring and radio telemetry tracking, [Footnote 171: Radio tracking of bats offshore will improve with the deployment of receiving towers, such as Motus towers, in the offshore environment and the additional tagging of bats.] can inform which bat species may be present in the offshore environment and post-construction monitoring, such as acoustic monitoring at nacelle height, radio telemetry tracking within the wind energy areas (WEAs), and use of collision detection technology, can inform bat risk and measure impacts from offshore wind operations.

Considering the limited data and information available on interactions between bats and offshore wind energy development, post-construction monitoring for bats will be critical. While pre- construction surveys represent an important first step to assessing bats' use of the offshore environment (including which bat species may be present), pre-construction monitoring is likely inappropriate for predicting post-construction fatality risk for bats. At land-based wind facilities, pre- construction bat activity does not correlate with post-construction fatalities, [Footnote 172: Solick D, Pham D, Nasman K, Bay K. Bat activity rates do not predict bat fatality rates at wind energy facilities. Acta Chiropterologica 22:135146); Hein CD, Gruver J, Arnett EB. 2013. Relating pre-construction bat activity and post-construction bat fatality to predict risk at wind energy facilities: a synthesis. A report submitted to the National Renewable Energy Laboratory. Bat Conservation International, Austin, TX, USA.] possibly due to bats' attraction to turbine structures (as discussed earlier). Furthermore, low levels of bat calls do not necessarily indicate that bats are not present. [Footnote 173: Corcoran AJ, Weller TJ. 2018. Inconspicuous echolocation in hoary bats (Lasiurus cinereus). Proceedings of the Royal Society B: Biological Sciences 285:20180441.] Determining methods to identify bat activity within offshore wind turbines' rotor-swept zones (including when this activity occurs and from which species) and detect collisions post-construction will be imperative to understanding bat risks from offshore wind development.

Offshore wind energy will likely predominantly impact bats by collisions with spinning turbine blades. However, there are currently no reliable methods for the widespread measurement of rates for bat collisions in offshore environments. Traditional fatality assessments that rely on searching for carcasses beneath and around wind turbine generators (WTGs) are not feasible at offshore sites. [Footnote 174: Kunz TH, Arnett EB, Cooper BM, Erickson WP, Larkin RP, Mabee T, Morrison ML, Strickland MD, Szewczak JM. 2007. Assessing impacts of wind- energy development on nocturnally active birds and bats: a guidance document. Journal of Wildlife Management 71:2,4492,486; Rydell J, Bach L, Dubourg-

Savage MJ, Green M, Rodrigues L, Hedenstrm A. 2010. Bat mortality at wind turbines in northwestern Europe. Acta Chiropterologica 12:261274.] As such, many dead or injured animals would likely go undetected, either falling into the water or becoming prey to marine scavengers or predators. Understanding impacts of offshore wind development will require a method for accurately estimating bat collisions offshore.

Comment Number: BOEM-2024-0008-1070-0146
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Figure X. Still images of night-flying bats (green arrows) around wind turbines can be detected in thermal infrared video footage. Here, cameras positioned 12 meters from the base of the turbine looked up an 80-m monopole toward the nacelle (rectangular machinery enclosure) and the rotor, to which spinning blades attach. Red circles depict bats as identified via automated software used for finding their presence in nightly (10 h) video recordings. Graphics from the study by Cryan et al. 2014.

By monitoring activity around operational turbines, acoustic detectors and thermal video (Figure X) could be used to better evaluate bat risk from turbine collisions. Because bat calls can often only be detected at close range, acoustic detectors should be installed at nacelle height to better measure activity within the turbine's swept area, where bats are at risk of collision. Collision detection technologies, which could monitor actual bat impacts, are also being developed and will be an essential future monitoring tool. [Footnote 175: For example, the Department of Energy (DOE) has recently funded development of collision detection technology from the Albertani Lab at Oregon State University. The Albertani group is continuing to test and modify its design to detect small object collisions with wind turbines at the National Renewable Energy Lab http://research.engr.oregonstate.edu/albertani/]

In addition, the Motus Wildlife Tracking System contains some data on bat movements, including along the Atlantic coast. This database should be expanded, with receiving towers installed in the offshore environment and additional bats tagged, and used to inform which species are using the offshore environment and thus need to be considered in the wind energy development process.

Comment Number: BOEM-2024-0008-1070-0147
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

We highlight the following specific monitoring needs for bats before construction and during operation: (1) Field surveys (likely acoustic) in the WEAs pre-construction to collect baseline information on the presence and activity levels of specific bat species; (2) Targeted radio tagging of bats and deployment of receiving towers (such as Motus towers) in the coastal and offshore environment, including on structures in WEAs to collect data on bat movement and presence, both pre- and post-construction; (3) Acoustic monitoring at nacelle height to better understand bat activity, including time of day and weather conditions, within the rotor swept zone this information will inform when bats are likely at greatest risk of collision with offshore wind turbines; and, (4) Collision detection technology (such as strike detection technology or advanced thermal imaging) to detect collisions, as these technologies become available for offshore WTGs

In addition, research to better understand bat risk in the offshore environment is needed. Specifically, research is needed to determine: (1) How attracted (if at all) are bats to offshore wind turbines and how

does this increase collision risk? (2) What times (both time of year and time of night) are bats at greatest risk and during what environmental conditions (e.g., wind speeds, temperatures)? (3) What environmental aspects (e.g., presence of islands or structures, distance to shore) affect bat impacts (and how)? (4) How do offshore wind turbine tower heights affect bat impacts? Research onshore has shown that bat mortality increases with tower height, [Footnote 176: Barclay RM, Baerwald EF, Gruver JC. 2007. Variation in bat and bird fatalities at wind energy facilities: assessing the effects of rotor size and tower height. Canadian Journal of Zoology 85:381387 https://doi.org/10.1139/Z07-011; Rydell J, Bach L, Dubourg-Savage MJ, Green M, Rodrigues L, Hedenstrm A. 2010. Bat mortality at wind turbines in northwestern Europe. Acta Chiropterologica 12:261274 https://doi.org/10.3161/150811010X537846.] meaning that development approaches that favor fewer, larger turbines could be detrimental to bats. [Footnote 177: A meta-analysis by Thompson et al. 2017 found no relationship between turbine height and bat fatalities but cautioned that research was needed to understand how turbines more than 140 m in height might affect bat fatalities. Thompson M, Beston JA, Etterson M, Diffendorfer JE, Loss SR.
2017. Factors associated with bat mortality at wind energy facilities in the United States. Biological Conservation 215:241245.] A study on northwestern European wind facilities found that bat fatalities increased with tower height and rotor diameter [Footnote 178: Rydell et al. 2010.] and a meta-analysis of North American wind facilities found that bat fatalities increased exponentially with tower height (although this study did not find that rotor diameter affected fatalities). [Footnote 179: Barclay et al. 2007.] Insufficient data exist to determine where (if any) a tradeoff exists between decreasing the number of towers vs. increasing their height. (5) Can acoustic monitoring tools and software can be improved such that bat calls can be reliably distinguished between calls from the Endangered Species Act (ESA) listed northern long-eared bat and other Myotis species?

Additional research priorities for bats were identified at the 2020 NYSERDA State of the Science Workshop on Wildlife and Offshore Wind Energy and should also be addressed. [Footnote 180: Hein, C., K. A. Williams, and E. Jenkins. 2021. Bat Workgroup Report for the State of the Science Workshop on Wildlife and Offshore Wind Energy 2020: Cumulative Impacts. Report to the New York State Energy Research and Development Authority (NYSERDA). Albany, NY. 21 pp. Available at https://www.nyetwg.com/2020-workgroups.]

Comment Number: BOEM-2024-0008-1070-0148
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Mitigation measures and monitoring needs for bats are inextricably linked. Better understanding of bat presence and behavior are needed to assess risks from offshore wind development and to determine whether mitigation measures will be needed. The current insufficiency of data on impacts to bats from offshore wind energy development does not imply that impacts are unlikely.

Data on bat activity and calls within the rotor-swept zone of offshore wind turbines would allow better understanding of which bat species are at risk and during what environmental conditions, which could inform mitigation measures. For example, bat activity offshore in the Atlantic seems to be predominantly restricted to warm, slow wind speed nights during migration periods. [Footnote 181: Peterson et al. 2016.] If monitoring efforts indicate that bat mitigation measures are needed, mitigation strategies, such as targeted curtailment (if shown to be effective in the offshore environment), could be restricted to

these highest risk times. In Europe, WTGs in the North Sea have operational curtailment between August 15 and October 1 to reduce impacts on a migratory bat species. [Footnote 182: Boonman, M. (2018). Mitigation measures for bats in offshore wind farms: Evaluation and improvement of curtailment strategies. Bureau Waardenburg, Ecologie & Landschap. Available at

https://www.noordzeeloket.nl/publish/pages/163977/mitigation_measures_for_bats_in_offshore_wind_farms_18-0227.pdf]

Comment Number: BOEM-2024-0008-1070-0149
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

In addition to assessing the need and effectiveness of minimization strategies like curtailment, it is critical that as the U.S. begins to adopt offshore wind technology, we expedite the development of sea-worthy collision minimization technologies. Deterrent technologies to prevent bats from approaching operational wind turbines are being developed for and deployed at land-based turbines [Footnote 183: These deterrent technologies include turbine coatings to counteract any attraction to smooth surfaces which might be perceived as water (Texturizing Wind Turbine Towers to Reduce Bat Mortality DE-EE0007033, https://www.energy.gov/sites/prod/files/2019/05/f63/TCU%20-%20M17%20-%20Hale-Bennett.pdf, ultraviolet lighting which many bat species can see (NREL Wind Research, Technology Development and Innovation Research Projects https://www.nrel.gov/wind/technology-development-innovation-projects.html, and ultrasonic noise emitters to possibly 'jam' bats' radars and make wind facilities unappealing to bats https://www.osti.gov/biblio/1484770%20%20%20%20; Weaver SP, Hein CD, Simpson TR, Evans JW, Castro-Arellano I. 2020. Ultrasonic acoustic deterrents significantly reduce bat fatalities at wind turbines. Global Ecology and Conservation 24:e01099 https://doi.org/10.1016/j.gecco.2020.e01099; Arnett EB, Hein CD, Schirmacher MR, Huso MM, Szewczak JM. 2013.
Evaluating the effectiveness of an ultrasonic acoustic deterrent for reducing bat fatalities at wind turbines. PloS One 8:e65794 https://doi.org/10.1371/journal.pone.0065794 . One of the ultrasonic deterrent technologies, NRG Systems, has been commercially deployed at a land-based wind facility (https://news.duke-energy.com/releases/duke-energy-renewables-to-use-new-technology-to-help-protect-bats-at-its-wind- sites).] and have been effective at reducing bat fatalities. [Footnote 184: This approach has proven to be an effective strategy for minimizing bat fatalities at land-based wind facilities (see, e.g., Weaver et al. 2020) and has achieved a greater than 90 percent reduction in some cases. Its effectiveness in the offshore environment has yet to be determined. Arnett EB, Huso MM, Schirmacher MR, Hayes JP. 2011. Altering turbine speed reduces bat mortality at wind-energy facilities. Frontiers in Ecology and the Environment 9:209214 https://doi.org/10.1890/100103. While a higher cut-in speed could translate to greater reductions in bat mortality, if turbines are feathered to wind speeds higher than the manufacturer's cut-in speed, energy production at the turbines will decrease. However, reductions in fatalities have been achieved at land-based WTGs by feathering turbines only to the manufacturer's cut in speed: one study revealed feathering blades up to the manufacturer's cut-in speed reduced overall bat fatalities by 36 percent and decreased eastern red bat fatalities, although there were no reductions in fatalities of either hoary or silver-haired bats.] However, none of these technologies have been assessed in the offshore environment or on turbines with such large rotor swept areas, which may present a challenge for effective use offshore.

Comment Number: BOEM-2024-0008-1070-0150
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

If monitoring reveals that offshore wind energy generation is having significant impacts on bats, the following mitigation measures should be considered: (1) Deterrent technologies to prevent bats from

approaching wind turbines. (2) Operational curtailment, including feathering turbine blades to prevent them from spinning during high-risk periods for bats (e.g., warm, slow wind speed nights during migration when bat activity is highest [Footnote 185: See Peterson et al. (2016). In their study, most of the bat activity in the Gulf of Maine and the Mid-Atlantic occurred below 10 m/s average nightly wind speed and above ~7C.] or in response to detected bat activity). This practice is known as targeted or smart curtailment and could be a useful tool for minimizing bat fatalities from turbine collisions. [Footnote 186: Whitby et al. 2021 provides an overview of the operational curtailment for bats and land-based wind. M.D. Whitby, M.R. Schirmacher, W.F. Frick. The State of the Science on Operation Minimization to Reduce Bat Fatality at Wind Energy Facilities. A Report Submitted to the National Renewable Energy Laboratory. Bat Conservation International, Austin, Texas (2021). Available at https://www.batsandwind.org/assets/pdfs/bwec-nrel-report- reduce-bat-fatality-wind-energy-facilities-2021.pdf]

Comment Number: BOEM-2024-0008-1070-0019
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Given that acoustic data indicates that the NARW is present in the vicinity of the lease area year round, and the extreme vulnerability of this species to vessel strikes, it is imperative that Atlantic Shores North implement additional protective measures for the right whale.

Comment Number: BOEM-2024-0008-1070-0020
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

For example, we note that within the COP, exclusion and clearance zones have not been established for pile driving activities. [Footnote 41: Atlantic Shores North Construction and Operations Plan, Volume II: at 4-256.] We encourage that Atlantic Shores North establish the following clearance zone distances prior to pile driving and exclusion zone distances during pile driving for the NARW and adopt the additional mitigation measures enumerated in Attachment 1:

1. A visual clearance zone and exclusion zone must extend at minimum 5,000 m in all directions from the location of the driven pile.
2. An acoustic clearance zone must extend at minimum 10,000 m in all directions from the location of the driven pile.
3. An acoustic exclusion zone must extend at minimum 2,000 m in all directions from the location of the driven pile.

Comment Number: BOEM-2024-0008-1070-0021
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

We strongly recommend that Atlantic Shores North employ robust near real-time monitoring protocols using passive acoustic monitoring (PAM). While the COP states that Atlantic Shores North will commit to and implement passive acoustic monitoring during inclement weather and low visibility conditions,

[Footnote 42: Id. at 4-256.] we recommend PAM be employed both before and during pile-driving activities regardless of visibility conditions. BOEM should require a robust monitoring plan, based on the recommendations in Attachment 1, which includes the use of PAM.

Comment Number: BOEM-2024-0008-1070-0026
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

The COP does not specify how many PSOs will be present on crew vessels and other project vessels. As outlined in Attachment 1, no fewer than four PSOs should be available to monitor all exclusion zones for sea turtles (and marine mammals) for vibratory driving and impact pile- driving, as well as any necessary high resolution geophysical and geotechnical survey activities. The vantage points and number of PSOs are critical factors for effective exclusion zone monitoring for sea turtles. To effectively monitor the full exclusion zone, multiple PSOs must be stationed at several vantage points at the highest level to allow each to continuously scan a section of the exclusion zone; a limited number of PSOs even continuously moving around the vantage point would still not be able to scan the entire exclusion zone. A minimum of four PSOs for all exclusion zone monitoring is recommended. Monitoring reports must be made publicly available. [Footnote 46: We note that specific information on the monitoring and mitigation plan for sea turtles is not currently included in the ASOW COP.]

Comment Number: BOEM-2024-0008-1070-0028
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

New Jersey Department of Environmental Protection vessel-based surveys, cross referenced with digital aerial surveys and the US Fish and WIldlife Service Information for Planning and Consultation (IPaC) database. Atlantic Shores North determined there are 145 recorded bird species within the project region. [Footnote 49: Id. at 4-35] For purposes of inclusivity, Table 4.3-1 should also include those marine bird species that are expected (or projected) from both the Marine-life Data and Analysis Team (MDAT) models (Curtice et al. 2019) and from the Northwest Atlantic Seabird Catalog (managed by NOAA).

Comment Number: BOEM-2024-0008-1070-0029
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Recognizing that much remains unknown regarding the impacts of offshore wind to avian species in the United States, BOEM must require an explicitly defined monitoring and adaptive management plan and use the best available science. This must include a requirement for sufficient standardized monitoring before and after construction, consistent with recommendations that emerge from the Regional Wildlife Science Collaborative (previously called the Regional Wildlife Science Entity).

Comment Number: BOEM-2024-0008-1070-0003
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

BOEM should include sufficient measures to protect our most vulnerable threatened and endangered species and require a robust plan for pre-, during, and post-construction monitoring that can enadrafble effective adaptive management strategies.

Comment Number: BOEM-2024-0008-1070-0030
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Avian collisions with turbines in the marine environment are difficult to detect and there are several factors that will influence avian presence, and therefore risk, within the lease location. For marine foragers, the distribution of food resources will be a likely factor in the presence/absence of some species. For migrant species, migration routes and weather effects can influence interaction potential. [Footnote 50: La Sorte, F.A., Fink, D., Hochachka, W.M., Farnsworth, A., Rodewald, A.D., Rosenberg, K.V., Sullivan, B.L., Winkler, D.W., Wood, C. and Kelling, S., 2014. The role of atmospheric conditions in the seasonal dynamics of North American migration flyways. Journal of Biogeography, 41(9), pp.1685-1696.] Currently, bird density and abundance data are used to develop collision potential for each species or guild evaluated. [Footnote 51: Green, R.E., Langsten, H.W., McCluskie, A., McCuskie, A., Sutherland, R. and Wilson, J.D., 2016. Lack of sound science in assessing wind farm impacts on seabirds. Journal of Applied Ecology, 53(6), pp.1635-1641.] The concern with this methodology is that collision risk models are sensitive to input parameters, e.g., number of birds identified to species, estimated abundance or density of species, or flight heights, which are rarely quantified. In addition, bird species at risk of wind energy collisions are not linked to source populations, and thus there is a difficulty in detecting population level effects of collision upon species. Moreover, although some inferences about collision risks might be extended validly from European studies[Footnote 52: Fox, A.D. and Petersen, I.K. 2019. Offshore wind farms and their effects on birds. Dansk Ornitologisk Forenings Tidsskrift 113: 86-101.] to similar or identical North American birds, the Atlantic Shores North project location overlaps with ranges of certain procellariiform birds (e.g., shearwaters) for which we have no impact data from anywhere.

Comment Number: BOEM-2024-0008-1070-0031
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Finally, bird counts and flight height data are usually insufficient in quantity and quality for precise estimation of seasonal variation, age structure, and differences in age-related activities of species affected by turbine collision. [Footnote 53: Green, R.E., Langsten, H.W., McCluskie, A., McCuskie, A., Sutherland, R. and Wilson, J.D., 2016. Lack of sound science in assessing wind farm impacts on seabirds. Journal of Applied Ecology, 53(6), pp.1635-1641.] Therefore, there is a need for long-term monitoring to understand not only risk of collision but also permanent population-level effects of potential impacts to avian populations.

Comment Number: BOEM-2024-0008-1070-0032
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Due to the uncertainty regarding impacts to avian species from offshore wind, an adaptive management plan and ongoing monitoring are critical. The adaptive management plan must explicitly outline a strategy to employ adequate mitigation measures, based on the impacts observed through monitoring efforts.

Comment Number: BOEM-2024-0008-1070-0033
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

In this manner, the Draft EIS can account for the reasonably foreseeable impacts of developing this and future projects and a commitment to addressing those impacts. We are therefore disappointed that the Avian and Bat Survey Plan is not available for public review, and urge BOEM and the developer to make this information public to allow for public oversight.

Comment Number: BOEM-2024-0008-1070-0034
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Components of migration can be labile and there are recorded events of species that alter their migration route/strategy on an annual basis depending upon weather, season, and resources. [Footnote 54: Jenni, L., Schaub, M. (2003). Behavioural and Physiological Reactions to Environmental Variation in Bird Migration: a Review. In: Berthold, P., Gwinner, E., Sonnenschein, E. (eds) Avian Migration. Springer, Berlin, Heidelberg. https://doi-org.ezproxy.lib.ou.edu/10.1007/978-3-662-05957-9_10] Monthly aerial-based monitoring of avian species within the lease area is not comprehensive enough to determine species-specific or guild-specific impacts unless there is a long-term component to the data collection. Even then, the monitoring is at a coarse scale to attempt to monitor species presence/absence fine-scale events in a finite area. More intensive monitoring is encouraged to reduce the uncertainty of species documented within the lease area.

Comment Number: BOEM-2024-0008-1070-0035
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

BOEM should call for incorporation of best monitoring and management practices into a regional adaptive management plan to adequately measure and mitigate cumulative impacts to birds from offshore wind developments expected across the Atlantic OCS for the reasonably foreseeable future.

Comment Number: BOEM-2024-0008-1070-0036
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Further, BOEM should promote the adoption of recommended standards across all projects moving forward to ensure that inferences from collected data can be compared across projects.

Comment Number: BOEM-2024-0008-1070-0038
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

However, information on bat impacts from land-based wind stems largely from post-construction carcass searches, which are not feasible in the offshore environment[Footnote 57: Assessing bat fatalities based on carcasses found on vessels and structuresa technique that has been proposed in several recent offshore wind project Construction and Operations Plans but not US Wind'sis unlikely to provide a meaningful estimate of bat fatalities, as carcasses can fall far from the wind turbine, based on carcass size, wind speed, turbine height, and other factors. We recommend BOEM consult with Manuela Huso, Research Statistician at United States Geological Survey Forest and Rangeland Ecosystem Science Center prior to making any inferences about total fatalities based on carcasses recovered from structures.] and therefore understanding and addressing impacts to bats from offshore wind facilitiessimilar to birdswill require novel monitoring technologies.

Comment Number: BOEM-2024-0008-1070-0040
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

The sparse data available on bats' use of the offshore environment in the region are insufficient to draw conclusions that bat risk is low or impacts are unlikely.

Comment Number: BOEM-2024-0008-1070-0043
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

We commend Atlantic Shores North for committing to two years of pre-construction acoustic monitoring for bats. [Footnote 62: Atlantic Shores North Construction and Operations Plan, Volume II at 4-76.] Nevertheless, we caution Atlantic Shores North to not overly rely on pre- construction acoustic surveys to determine whether post-construction monitoring is necessary. While pre-construction surveys represent an important first step to assessing bats' use of the offshore environment (including which bat species may be present, although not all bat calls can be identified to species), pre-construction monitoring is likely to be inappropriate for predicting post-construction fatality risk for bats. At land-based wind facilities, pre-construction bat activity does not correlate with post-construction fatalities, [Footnote 63: Donald Solick et al., Bat activity rates do not predict bat fatality rates at wind energy facilities, ACTA CHIROPTERA (June 2020); Cris D. Hein et al., Relating pre-construction bat activity and post-construction bat fatality to predict risk at wind energy facilities: A synthesis, NAT'L RENEWABLE ENERGY LAB. (NREL) (Mar.

2013)] possibly due to bats' attraction to turbine structures. Furthermore, low levels of bat calls do not necessarily indicate that bats are not present. [Footnote 64: Aaron J. Corcoran et al., Inconspicuous echolocation in hoary bats (Lasiurus cinereus), PROCEEDINGS ROYAL SOC'Y B (May 2, 2018).]

Comment Number: BOEM-2024-0008-1070-0044
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Determining methods to identify bat activity within offshore wind turbines' rotor-swept zones (including when this activity occurs and from which species) and detect collisions post- construction will be imperative to understanding bat risks from offshore wind development. Rather than rely on the pre-construction acoustic data collected by the metocean buoy to determine the need for post-construction bat monitoring, [Footnote 65: US Wind COP Vol II at p. 219.]

Comment Number: BOEM-2024-0008-1070-0045
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Atlantic Shores North should develop a post-construction bat monitoring plan that includes a commitment to integrate strike detection technology, as it becomes commercially available and feasible to install offshore. Though Motus towers have been installed in an adjacent lease area, [Footnote 66: Atlantic Shores North Construction and Operations Plan, Volume II: at 4-61.] Atlantic Shores North should deploy a Motus tower in the Project Area as soon as possible and support nanotagging of bats to better understand bat use of the Lease Area. Once turbines are in place, Atlantic Shores North should install acoustic detectors at nacelle height to better measure activity within the turbine's swept area, where bats are at risk of collision.

Comment Number: BOEM-2024-0008-1070-0050
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

To protect the future of marine mammals and sea turtles, we must avoid additional threats to these species from offshore wind, and implement stringent measures for each project to safeguard these species during site assessment, construction, operations, and decommissioning.

Comment Number: BOEM-2024-0008-1070-0052
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Strong protections are required to fulfill federal legal requirements for protecting marine mammals and sea turtles[Footnote 8: All marine mammals are protected under the Marine Mammal Protection Act. The Endangered Species Act also provides protections to many species of marine mammals, as well as some species of sea turtles and other marine wildlife.] and will ensure we can achieve the Biden

administration's goals to deploy 30 gigawatts (GW) of offshore wind energy by 2030 and 15 additional GW of floating offshore wind by 2035, while protecting biodiversity, cultural resources, and ocean uses.

Comment Number: BOEM-2024-0008-1070-0054
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

If pile driving must occur, effective noise abatement systems are commercially available, [Footnote 11: See, e.g., "AdBm Noise Mitigation System." AdBm Technologies. https://adbmtech.com/] and near real-time monitoring technologies that can be used to trigger mitigation measures are being tested or are already being used by other sectors.

Comment Number: BOEM-2024-0008-1070-0060
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

The mitigation measures presented in this document are based on the best available scientific information and are needed to ensure offshore wind advances responsibly. These fundamental requirements are necessary to protect marine mammal and sea turtle species, including those particularly vulnerable to the potential impacts posed by offshore wind energy development. These recommendations may change as new scientific and/or technological advancements occur, and additional recommendations may be developed for these and other marine species. The measures are designed to first avoid, and then minimize and mitigate, potential impacts during the site assessment and characterization, construction, and operation phases. [Footnote 17: This document should be considered together with other ENGO recommendations on how to advance offshore wind energy development in a responsible manner, including the importance of selecting sites that offer the least environmental impact.] Mitigation measures for the repowering and decommissioning phases of offshore wind energy development will be developed as needed.

Comment Number: BOEM-2024-0008-1070-0061
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Vessel strike mitigation recommendations during all stages of offshore wind development
1) Require mandatory vessel speed restrictions:
a) All project-associated vessels must adhere to a 10-knot speed restriction at all times except for reasons of safety.
b) When traveling in any area where one or more regulations establish a speed restriction, either seasonally or dynamically, all project-associated vessels must adhere to the most stringent (i.e., the lowest speed) regulation applicable to that area. Vessels must also comply with all applicable speed restrictions established by permit.
c) All project-associated vessels must slow to 4 knots, except for reasons of safety, while transiting through areas of visible jellyfish aggregations or floating vegetation lines or mats to improve protection for sea turtles.

Comment Number: BOEM-2024-0008-1070-0062
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

2) Future alternative for vessel strike risk reduction:
a) A 10-knot speed restriction is currently the only proven method for reducing the risk of lethal vessel strike of large whales. However, the development of near real-time monitoring technologies for North Atlantic right whales, and potentially other species of large whales, may provide alternative tools for mitigating vessel strike risk in the future. When the best available science demonstrates that vessel strike avoidance methods can provide comparable or greater vessel strike risk reduction than a 10-knot speed restriction, project proponents may develop an "Adaptive Plan" that modifies the 10-knot speed restriction. A determination that vessel strike avoidance methods can provide comparable or greater vessel strike risk reduction than a 10- knot speed restriction should be informed by the effectiveness criteria being developed by the joint Regional Wildlife Science Collaborative for Offshore Wind (RWSC) and Marine Technology Society Technology Workshop Series. [Footnote 18: RWSC, "Technology Workshops," https://rwsc.org/technology-workshops/. This series is being funded by the Department of Energy, with contributions from NOAA and BOEM.] Any Adaptive Plan must be developed in consultation with the National Ocean and Atmospheric Administration (NOAA) Fisheries.

Comment Number: BOEM-2024-0008-1070-0063
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

3) Implement other vessel-related measures:
a) Any designated crew lookouts must receive training on protected species identification, including distinguishing between large whale species and observing for the presence of small cetaceans, manatees, and sea turtles; vessel strike minimization procedures; how and when to communicate with the vessel captain; and reporting requirements.
b) All vessel crew members must be briefed on the identification of marine mammal and sea turtle species.
c) Vessels should maintain a separation distance of 500 meters (m) from North Atlantic right whales and other large whale species.
i) Any time a large whale is within 200 m of an underway vessel, or the vessel encounters a feeding aggregation of large whales, a full stop is required if safety permits.
ii) The vessel should remain stationary until large whales have moved at least 200 m away from the vessel, after which point the separation distance should again be maintained.
d) Vessels should maintain a separation distance of 100 m from all other marine mammal species and from sea turtles.
e) Vessels in transit must post at least one trained lookout or Protected Species Observer (PSO) [Footnote 19: Protected Species Observers are trained professionals who monitor for protected species so that the possibility of vessel strikes is minimized and to prevent or shut down any sound sources or other development activity causing harassment if protected species are detected within a certain distance. For the purposes of the recommendations set out in this document, lessees, operators, and developers should use trained, independent, third-party Protected Species Observers (e.g., not construction personnel) that are approved by NOAA Fisheries. Protected Species Observers should have no duties other than to effectively implement mitigation and monitoring measures during site assessment, construction, and/or operations.] to search for marine mammals and sea turtles and notify the captain upon visual detection.[Footnote 20: Additional PSO requirements for vessels conducting site assessment and

construction activities are provided in Section II(5)(b) (site assessment and characterization activities), Section III(8)(b) (pile-driving activities), and Section IV(3)(b) (installation of quiet foundations).]
i) If the trained lookout is a vessel crew member, this must be their designated role and primary responsibility while the vessel is transiting.
ii) If a whale is observed that may be a North Atlantic right whale but its species cannot be confirmed, the vessel operator must assume that it is a North Atlantic right whale and take appropriate action for avoidance or stoppage.
f) All vessels responsible for crew transport should use thermal detection systems to supplement visual monitoring of marine mammals during transit, with at least one additional trained crew lookout or PSO monitoring the thermal detection system at all times.
g) All vessels (developer- and contractor-operated) must maintain a functioning Automatic Identification System (AIS) onboard and operate this system at all times.

Comment Number: BOEM-2024-0008-1070-0064
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

4) Additional vessel-related measures for the North Atlantic right whale:
a) Develop and implement the project's schedule to reduce vessel density during the times of year when North Atlantic right whales are most likely to occur in lease areas and along vessel routes. Coordinate across different offshore wind development projects to reduce cumulative vessel density within the region, to the extent practicable.
i) Time periods of highest risk include, but are not limited to, during foraging and migration, and times when mother-calf pairs, pregnant females, surface active groups (indicative of breeding or social behavior), or aggregations of three or more whales (indicative of feeding or social behavior) are, or are expected to be, present. Time periods should be defined based on the best available scientific information.

Comment Number: BOEM-2024-0008-1070-0065
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

1) Prohibit site assessment and characterization activities during times of highest risk for North Atlantic right whales:
a) Site assessment and characterization activities involving high-resolution geophysical survey equipment with noise levels that could injure or harass marine mammals (at or below a frequency of 180 kHz) should not occur during periods of highest risk to North Atlantic right whales. Time periods of highest risk include, but are not limited to, during foraging and migration, and times when mother-calf pairs, pregnant females, surface active groups (indicative of breeding or social behavior), or aggregations of three or more whales (indicative of feeding or social behavior) are, or are expected to be, present. Time periods must be defined based on the best available scientific information.
b) If a near real-time monitoring system and mitigation protocol for North Atlantic right whales and other large whale species is developed and scientifically validated, the system and protocol may be used to dynamically manage the timing of site assessment and characterization activities to ensure those activities are undertaken during times of lowest risk for all relevant large whale species. The development of such a protocol is particularly important where foraging aggregations of other large whale species are observed coincident with the times that noise-producing activities would most likely be undertaken based on times of lower relative risk to North Atlantic right whales.

Comment Number: BOEM-2024-0008-1070-0066
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

2) Require diel restrictions on site assessment and characterization activities:
a) Site assessment and characterization activities must not be initiated within 1.5 hours of civil sunset or in times of low visibility when the visual clearance zones and exclusion zones (defined in Section II(3) below) cannot be visually monitored, as determined by the lead Protected Species Observer (PSO) on duty.

Comment Number: BOEM-2024-0008-1070-0067
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

3) Require the following clearance zone and exclusion zone distances prior to site assessment and characterization activities with noise levels known to injure or harass marine mammals (defined throughout this section as source levels at or below a frequency of 180 kHz):
a) For North Atlantic right whales:
i) A visual clearance zone and exclusion zone of at least 1,000 m must be established around each vessel or sound source.
ii) An acoustic clearance zone and exclusion zone of at least 1,000 m must be established around each vessel or sound source.
b) If a large whale is detected visually or acoustically within the 1,000 m clearance or exclusion zone but the species cannot be identified, it must be assumed to be a North Atlantic right whale.
c) For other large whale species, coastal bottlenose dolphins, harbor porpoises, and manatees:
i) A visual clearance zone and exclusion zone must extend at least 500 m in all directions from each vessel or sound source.
d) For all other marine mammal species:
i) Clearance and exclusion zone distances for other marine mammal species must be designed in a manner that eliminates Level A take and minimizes behavioral harassment to the fullest extent practicable.

Comment Number: BOEM-2024-0008-1070-0068
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

4) Delay initiation or require shutdown of site assessment and characterization activities with noise levels known to injure or harass marine mammals (defined throughout this section as source levels at or below a frequency of 180 kHz) if a marine mammal is detected visually or if a North Atlantic right whale is detected acoustically in clearance and exclusion zones (as defined in Section II(3)):
a) If a marine mammal species is visually detected within the relevant visual clearance zone for that species, as defined under Section II(3), site assessment and characterization activities must not be initiated.
b) If a marine mammal is visually detected within the relevant visual exclusion zone for that species, as defined under Section II(3), site assessment and characterization activities must be halted.
c) If a North Atlantic right whale is acoustically detected within the acoustic clearance zone, site assessment and characterization activities must not be initiated.

i) If localization, as described in Section II(5)(a)(i) below, cannot be achieved by acoustic detection, site assessment and characterization activities should not be initiated upon detection of a North Atlantic right whale call, regardless of distance from sound source.
d) If a North Atlantic right whale is acoustically detected within the acoustic exclusion zone, site assessment and characterization activities must be halted.
i) If localization, as described in Section II(5)(a)(i) below, cannot be achieved by acoustic detection, site assessment and characterization activities should be suspended upon detection of a North Atlantic right whale call, regardless of distance from sound source.
e) Once halted, site assessment and characterization activities may resume following the methods set forth in Section II(5) and after the lead PSO confirms no marine mammals have been detected within the relevant acoustic and visual clearance zones, as defined under Section II(3).

Comment Number: BOEM-2024-0008-1070-0069
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

5) Require robust monitoring protocols during pre-clearance and when site assessment and characterization activities are underway:
a) Monitoring of the acoustic clearance zone must be undertaken using near real-time passive acoustic monitoring (PAM) [Footnote 21: Throughout this document "PAM" refers to a real-time passive acoustic monitoring system. NOAA and BOEM have defined minimum recommendations for use of PAM in monitoring and mitigation for offshore wind development. Van Parijs SM et al. 2021. "NOAA and BOEM Recommendations for Use of Passive Acoustic Listening Systems in Offshore Wind Energy Development Monitoring and Mitigation Programs." Front. Mar. Sci. 8. Available at, https://www.frontiersin.org/articles/10.3389/fmars.2021.760840/full.] and must be undertaken from a vessel other than the survey vessel, or from a stationary unit, to avoid the hydrophone being masked by the survey vessel or development-related noise.
i) The PAM system should be set up so that it is capable of localizing the position of vocalizing whales. A plan detailing any proposed localization system and analysis methods should be submitted to BOEM and other relevant permitting agencies in advance of deployment. The system should meet the following criteria:[Footnote 22: See, also, recommendations in Van Parijs SM et al. 2021.]
(1) Stationary systems must have a minimum of three hydrophones (accuracy can be greatly improved by using four hydrophones), and mobile systems (e.g., towed arrays) must have a minimum of two hydrophones.
(2) Simulations should be conducted prior to selecting the number and location of receivers to maximize accuracy (i.e., reduce confidence intervals) in the final configuration.[Footnote 23: There are several mathematical methods to improve the accuracy of localization estimates by reducing the confidence intervals for each parameter that should be follow. See Spiesberger J. 2022. Extremely reliable locations and calling abundance via passive acoustic monitoring. Oral Presentation. NYSERDA State of the Science Workshop. July 27, 2022. https://www.youtube.com/watch?v=-tV8ViBVQzg.]
(3) Systems should be calibrated before deployment to ensure accurate detection capability.
(4) For time-of-arrival based systems, synchronization of data streams from the multiple receivers is necessary for accurate calculations.
(5) Irrespective of the system used, careful testing and documentation of localization errors should be undertaken.
b) During pre-clearance and when site assessment and characterization activities are underway, monitoring of the visual clearance zone must be undertaken by vessel-based PSOs stationed on the survey vessel to enable monitoring of the entire clearance zones for marine mammals. On each vessel, there must be a minimum of four PSOs following a two-on, two-off rotation, each responsible for scanning no more

than 180 of the horizon. To effectively monitor the full exclusion zone, multiple PSOs must be stationed at several vantage points at the highest level to allow each to continuously scan a section of the exclusion zone. Ensure PSOs do not exceed two consecutive watch hours on duty at any time, have a two-hour (minimum) break between watches, and do not exceed a combined watch schedule of more than 12 hours in a 24-hour period. PSO schedules should be designed to minimize observer fatigue.
c) Acoustic monitoring for North Atlantic right whales and visual monitoring for marine mammal species must begin at least 30 minutes prior to the commencement or re- initiation of site assessment and characterization activity and must be conducted throughout the duration of activity.

Comment Number: BOEM-2024-0008-1070-0070
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

6) Require underwater noise reduction to the fullest extent feasible:
a) The impacts of underwater noise must be minimized to the fullest extent feasible, including through the use of technically and commercially feasible and effective noise reduction and attenuation measures. For example, project proponents should select and operate sub-bottom profiling systems at power settings that achieve the lowest practicable source level for the objective. The site assessment plan submittal should provide detail as to how the operator has reduced noise output within the range of marine mammal audibility to the fullest extent feasible.
b) For deep-water site assessment and characterization surveys (floating wind only): Where water depth is greater than 100 m, survey equipment should be deployed using an autonomous underwater vehicle (AUV) operated a maximum of 40 m above the seafloor.
c) Project proponents should report the steps taken (including, for example, power settings used) to meet the recommendations in this subsection in the annual report of site assessment activities submitted to BOEM pursuant to 30 C.F.R. 585.615.

Comment Number: BOEM-2024-0008-1070-0071
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

7) Require mandatory reporting of marine mammals and sea turtles detected during pre-clearance and site assessment and characterization activities:
a) All visual observations and acoustic detections of North Atlantic right whales must be reported to NOAA Fisheries or the United States Coast Guard as soon as possible and no later than the end of the PSO shift. We note that, in some cases, such as with the use of near real- time autonomous buoy systems, the detections will be reported automatically on a pre-set cycle.
b) Observations of entangled, injured, or dead North Atlantic right whales, and other entangled, injured, and dead marine mammal species and sea turtles, must be immediately reported to NOAA Fisheries' Northeast Marine Mammal and Sea Turtle Stranding and Entanglement Hotline (1-866-755-6622) for states from Maine to Virginia; NOAA Fisheries' Southeast Marine Mammal Stranding Hotline (1-877-942-5343) or Southeast Sea Turtle Stranding and Salvage Network (1-844-732-8785) for states from North Carolina to Florida; [Footnote 24: NOAA Fisheries, "Report a Stranded or Injured Marine Animal," https://www.fisheries.noaa.gov/report.] or the United States Coast Guard via one of several available systems (e.g., phone, app, radio). Methods of reporting are expected to advance and streamline in the coming years, and projects should commit to supporting and participating in these efforts.
c) PSO sightings data must be submitted to BOEM as directed in any relevant guidance, site assessment

plan (SAP) or construction and operations plan (COP) approval, or other agency protocol. Sightings data and reports provided to BOEM should be made publicly available by BOEM to inform marine mammal and sea turtle science and protection.

Comment Number: BOEM-2024-0008-1070-0072
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

1) Use quiet foundations in construction.
a) Whenever possible, project proponents should use gravity-based and suction bucket foundations, which eliminate the need for pile driving and thereby significantly reduce underwater noise pollution and the risk of noise impacts to marine mammals and sea turtles.

Comment Number: BOEM-2024-0008-1070-0073
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

2) Prohibit pile driving during times of highest risk to North Atlantic right whales:
a) Pile driving must not occur during periods of highest risk to North Atlantic right whales. Time periods of highest risk include, but are not limited to, during foraging and migration, and times when mother-calf pairs, pregnant females, surface active groups (indicative of breeding or social behavior), or aggregations of three or more whales (indicative of feeding or social behavior) are, or are expected to be, present. Time periods must be defined based on the best available scientific information.
b) If a near real-time monitoring system and mitigation protocol for North Atlantic right whales and other large whale species is developed and scientifically validated, the system and protocol may be used to dynamically manage the timing of pile driving and other construction activities to ensure those activities are undertaken during times of lowest risk for all relevant large whale species. The development of such a protocol is particularly important where foraging aggregations of other large whale species are observed coincident with the times that pile driving would most likely be undertaken based on times of lower relative risk to North Atlantic right whales.

Comment Number: BOEM-2024-0008-1070-0074
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

3) Restrict pile-driving activity at night and during periods of low visibility:
a) Pile driving must not be initiated within 1.5 hours of civil sunset or in times of low visibility when the visual clearance zone and exclusion zone (defined in Section III(5) below) cannot be visually monitored, as determined by the lead PSO on duty.
b) Pile driving may continue after dark only if the activity commenced during daylight hours and must proceed for human safety or installation feasibility reasons, [Footnote 25: Throughout this document, "installation feasibility" refers to ensuring that the pile installation event results in a usable foundation for the wind turbine (i.e., foundation installed to the target penetration depth without refusal and with a horizontal foundation/tower interface flange). In the event that pile driving has already started and nightfall occurs, the lead engineer on duty will make a determination through the following evaluation: 1)

Use the site-specific soil data on the pile location and the real-time hammer log information to judge whether a stoppage would risk causing piling refusal at re-start of piling; and 2) Check that the pile penetration is deep enough to secure pile stability in the interim situation, taking into account weather statistics for the relevant season and the current weather forecast. Such determinations by the lead engineer (or their alternate) on duty will be made for each pile location as the installation progresses and not for the site as a whole. This information will be included in the reporting for the project.] and if required night-time monitoring protocols are followed (see Section III(8)).

Comment Number: BOEM-2024-0008-1070-0075
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

4) Sound fields generated during impact pile driving must not exceed NOAA Fisheries' Level A permanent threshold shift (PTS) limits for low frequency cetaceans (LFC) by the specified date and at the distances below. Every attempt must be made to reach the Received Sound Level Limit (RSLL) at 100% of foundations.
a) Voluntary:
i) May 1, 2025: After the first three foundations, no exceedance of RSLL beyond 4,921 feet (ft) (1,500 m) from the foundation for 90% of remaining piles.
b) Required:
i) May 1, 2026: After the first three foundations, no exceedance of RSLL beyond 4,921 ft (1,500 m) from the foundation for 90% of remaining piles.
ii) May 1, 2028: After the first three foundations, no exceedance of RSLL beyond 3,280 ft (1,000 m) from the foundation for 90% of remaining piles.
iii) May 1, 2030: After the first three foundations, no exceedance of RSLL beyond 2,460 ft (750 m) from the foundation for 90% of remaining piles.
c) On a case-by-case basis, BOEM may consider an exception to the RSLL if the lessee provides sufficient written justification, as determined by BOEM, of why meeting the RSLL is not technically and commercially practicable. In these cases, compensatory mitigation may be considered, such as operator contributions to research and monitoring that reduce noise or contribute to a better understanding of noise reduction.
d) Field measurements must be conducted as described in section 3 ("Offshore Wind Pile Driving Sound Field Measurement Recommendations") of the Nationwide Recommendations for Impact Pile Driving Sound Exposure Modeling and Sound Field Measurement for Offshore Wind Construction and Operations Plans (BOEM, 2023). As described in BOEM (2023), the "Thorough SFV Monitoring" procedure should be conducted for the first three foundations of a project and when a foundation is to be installed with substantially different foundation, construction, and
environmental parameters. An "Abbreviated SFV Check" should be performed on any foundation installation for which "Thorough SFV Monitoring" is not planned.
e) Sound source validation reports of field measurements must be evaluated by both BOEM and NOAA Fisheries prior to additional piles being installed. Reports must be made publicly available within one month after their submission to BOEM and other relevant agencies.

Comment Number: BOEM-2024-0008-1070-0076
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

5) Require the following clearance zone distances prior to pile driving and exclusion zone distances during pile driving:
a) For North Atlantic right whales:
i) A visual clearance zone and exclusion zone must extend at minimum 5,000 m in all directions from the location of the driven pile.
ii) An acoustic clearance zone must extend at minimum 10,000 m in all directions from the location of the driven pile.
iii) An acoustic exclusion zone must extend at minimum 2,000 m in all directions from the location of the driven pile.
iv) If a surface active group (indicative of breeding or social behavior), or an aggregation of three or more whales (indicative of feeding or social behavior) is detected via regional or opportunistic detection methods (e.g., regional aerial surveys or WhaleAlert) within 20 kilometers of a pile installation site, then the start of pile driving should be delayed until the surface-active group or aggregation is no longer reported within that distance.
b) If a large whale is detected visually or acoustically within the clearance or exclusion zones defined in Section III(5)(a) for North Atlantic right whales, but the species cannot be identified, it must be assumed to be a North Atlantic right whale.
c) For all other marine mammals:
i) Clearance and exclusion zone distances for other marine mammal species must be designed in a manner that eliminates Level A take and minimizes behavioral harassment to the fullest extent practicable.
d) For sea turtles:
i) A visual clearance zone and exclusion zone must extend at minimum 500 m in all directions from the location of the driven pile.

Comment Number: BOEM-2024-0008-1070-0077
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

6) Require a 24-hour pre-construction passive acoustic monitoring period for North Atlantic right whales prior to commencing pile-driving activities:
a) Monitoring for North Atlantic right whales must be undertaken using near real-time PAM, assuming a detection range of at least 10,000 m, for 24 hours prior to commencing pile- driving activities. PAM must be undertaken at the location of the pile-driving site in order to detect whales within a 10,000 m radius.
b) If a North Atlantic right whale vocalization is detected, the 24-hour monitoring period must be recommenced. Pile-driving activities must not commence until a 24-hour monitoring period has passed without any detection of North Atlantic right whale vocalizations.

Comment Number: BOEM-2024-0008-1070-0078
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

7) Delay initiation or require shutdown of pile driving if a marine mammal or sea turtle is detected

visually or if a North Atlantic right whale is detected acoustically in clearance and exclusion zones (as defined in Section III(5)):
a) Pile driving must not be initiated when monitoring methods defined in Section III(8) result in either an acoustic detection within the acoustic clearance zone of one or more North Atlantic right whales or a visual detection within the visual clearance zone of one or more marine mammals or sea turtles.
i) If localization cannot be achieved by acoustic detection, as described in Section III(8)(a)(i) below, pile driving must not be initiated upon detection of a North Atlantic right whale call, regardless of distance from the sound source.
b) Pile driving must not be initiated or, if already underway, must be shut down, unless continued pile-driving activities are necessary for reasons of human safety or installation feasibility, when monitoring methods defined in Section III(8) result in acoustic detection within the acoustic exclusion zone of one or more North Atlantic right whales or a visual detection within the visual exclusion zone of one or more marine mammals or sea turtles.
i) If localization cannot be achieved by acoustic detection, as described in Section III(8)(a)(i) below, pile driving must not be initiated or, if already underway, must be shut down upon detection of a North Atlantic right whale call, regardless of distance from the sound source.
c) Pile driving must be shut down, unless continued pile-driving activities are necessary for reasons of human safety or installation feasibility, if a North Atlantic right whale is visually detected by PSOs at any distance from the pile.
d) Once halted, pile driving may resume only after using the methods set forth in Section III(8) and the lead PSO confirms no marine mammals or sea turtles have been detected within the relevant acoustic and visual clearance zones.

Comment Number: BOEM-2024-0008-1070-0079
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

8) Require robust near real-time monitoring protocols during pre-clearance and when pile- driving activity is underway:
a) Monitoring of the acoustic clearance and exclusion zones must be undertaken using near real-time PAM, assuming a detection range of at least 10,000 m, and must be undertaken from a vessel other than the pile-driving vessel, or from a stationary unit, to avoid the hydrophone being masked by the pile-driving vessel or development-related noise.
i) The PAM system should be set up so that it is capable of localizing the position of vocalizing whales. A plan detailing any proposed localization system and analysis methods should be submitted to BOEM and other relevant permitting agencies in advance of deployment. The system should meet the following criteria:[Footnote 26: See, also, recommendations in Van Parijs SM et al. 2021.]
(1) Stationary systems must have a minimum of three hydrophones (accuracy can be greatly improved by using four hydrophones), and mobile systems (e.g., towed arrays) must have a minimum of two hydrophones.
(2) Simulations should be conducted prior to selecting the number and location of receivers to maximize accuracy (i.e., reduce confidence intervals) in the final configuration. [Footnote 27: There are several mathematical methods to improve the accuracy of localization estimates by reducing the confidence intervals for each parameter that should be follow. See Spiesberger J. 2022.]

(3) Systems should be calibrated before deployment to ensure accurate detection capability.
(4) For time-of-arrival based systems, synchronization of data streams from the multiple receivers is necessary for accurate calculations.
(5) Irrespective of the system used, careful testing and documentation of localization errors should be

undertaken.
b) During pre-clearance and when pile-driving activity is underway, monitoring of the visual clearance and exclusion zones must be undertaken by vessel based PSOs stationed at the pile- driving site and on additional vessels circling the pile-driving site, as needed. On each vessel, there must be a minimum of four PSOs following a two-on, two-off rotation, each responsible for scanning no more than 180 of the horizon per pile-driving location. To effectively monitor the full exclusion zone, multiple PSOs must be stationed at several vantage points at the highest level to allow each to continuously scan a section of the exclusion zone. Additional vessels must survey the clearance and exclusion zones at speeds of 10 knots or less. Ensure PSOs do not exceed two consecutive watch hours on duty at any time, have a two-hour (minimum) break between watches, and do not exceed a combined watch schedule of more than 12 hours in a 24-hour period. PSO schedules should be designed to minimize observer fatigue.
c) Acoustic and visual monitoring must begin at least 60 minutes prior to the commencement or re-initiation of pile driving and must be conducted throughout the duration of pile-driving activity. Visual monitoring must continue until 30 minutes after cessation of pile driving.
d) Infrared technology must be used to support visual monitoring during any pile-driving activities that extend into periods of darkness.
e) Additional observers and monitoring technologies (e.g., infrared, drones, hydrophones) must be deployed, as needed, to ensure the ability to monitor the established clearance and exclusion zones, including during periods of darkness or poor visibility.

Comment Number: BOEM-2024-0008-1070-0080
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

9) Require mandatory reporting of marine mammals and sea turtles detected during pre-clearance, when pile driving is underway, and for at least 30 minutes following pile driving:
a) All visual observations and acoustic detections of North Atlantic right whales must be reported to NOAA Fisheries or the United States Coast Guard as soon as possible and no later than the end of the PSO shift. We note that, in some cases, such as with the use of near real- time autonomous buoy systems, the detections will be reported automatically on a pre-set cycle.
b) Observations of entangled, injured, or dead North Atlantic right whales, and other entangled, injured, and dead marine mammal species and sea turtles, must be immediately reported to NOAA Fisheries' Northeast Marine Mammal and Sea Turtle Stranding and Entanglement Hotline (1-866-755-6622) for states from Maine to Virginia; NOAA Fisheries' Southeast Marine Mammal Stranding Hotline (1-877-942-5343) or Southeast Sea Turtle Stranding and Salvage Network (1-844-732-8785) for states from North Carolina to Florida;[Footnote 28: NOAA Fisheries, "Report a Stranded or Injured Marine Animal," https://www.fisheries.noaa.gov/report.] or the United States Coast Guard via one of several available systems (e.g., phone, app, radio). Methods of reporting are expected to advance and streamline in the coming years, and projects should commit to supporting and participating in these efforts.
c) PSO sightings data must be submitted to BOEM as directed in any relevant guidance, site assessment plan (SAP) or construction and operations plan (COP) approval, or other agency protocol. Sightings data and reports provided to BOEM should be made publicly available by BOEM to inform marine mammal and sea turtle science and protection.

Comment Number: BOEM-2024-0008-1070-0081
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Noise mitigation recommendations for construction of gravity-based and suction bucket foundations and floating offshore wind platforms
Gravity-based and suction bucket foundations and floating offshore wind platforms eliminate the need for pile driving, require decreased noise mitigation and monitoring measures, and may enable flexibility in construction timing. The installation of quieter foundations may still pose some disruption to North Atlantic right whales, other marine mammal species, and sea turtles. We offer the following recommendations out of full precaution for these species, until we can monitor the installation process and better understand the potential risk.

Comment Number: BOEM-2024-0008-1070-0082
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

1) Require the following clearance zone distances prior to construction activities and exclusion zone distances during construction activities:
a) Clearance zone and exclusion zone distances for marine mammals must be designed that will eliminate Level A take and minimize behavioral harassment to the full extent practicable during the installation of gravity-based or suction bucket foundations, or floating offshore wind platforms, considering noise levels expected to be generated during installation.
b) Clearance and exclusion zones of 100 m must be established for sea turtles.

Comment Number: BOEM-2024-0008-1070-0083
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

2) Delay initiation of or require shutdown of construction activities if a marine mammal or sea turtle is detected visually or if a North Atlantic right whale is detected acoustically in clearance or exclusion zones (as defined in Section IV(1)):
a) Installation of gravity-based and suction bucket foundations and floating offshore wind platforms must not be initiated when the application of monitoring methods defined in Section IV(3) results in a visual detection of a marine mammal or sea turtle or an acoustic detection of a North Atlantic right whale within the relevant clearance zone (as defined based on noise levels expected during installation; see Section IV(1)).
i) If localization, as described in Section IV(3)(a)(i) below, cannot be achieved by acoustic detection, installation activities should not be initiated upon detection of a North Atlantic right whale call, regardless of distance from sound source.
b) Installation of gravity-based and suction bucket foundations and floating offshore wind platforms must be halted, unless continued installation activities are necessary for reasons of human safety or installation feasibility, when the application of monitoring methods defined in Section IV(3) results in a visual detection of a marine mammal or sea turtle or an acoustic detection of a North Atlantic right whale within the relevant exclusion zone (as defined based on noise levels expected during installation; see Section IV(1)).

i) If localization, as described in Section IV(3) below, cannot be achieved by acoustic detection, installation activities should not be initiated upon detection of a North Atlantic right whale call, regardless of distance from sound source.
c) Once halted, installation may resume after use of the methods set forth in Section IV(3) and the lead PSO confirms no marine mammal or sea turtle species have been detected within the relevant clearance zones.

Comment Number: BOEM-2024-0008-1070-0084
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

3) Require robust near real-time monitoring protocols during clearance and installation:
a) Monitoring of the acoustic clearance and exclusion zones for North Atlantic right whales must be undertaken using near real-time PAM from a vessel other than the installation vessel, or from a stationary unit, to avoid the hydrophone being masked by installation- related noise.
i) The PAM system should be set up so that it is capable of localizing the position of vocalizing whales. A plan detailing any proposed localization system and analysis methods should be submitted to BOEM and other relevant permitting agencies in advance of deployment. The system should meet the following criteria: [Footnote 29: See, also, recommendations in Van Parijs SM et al. 2021.]
(1) Stationary systems must have a minimum of three hydrophones (accuracy can be greatly improved by using four hydrophones), and mobile systems (e.g., towed arrays) must have a minimum of two hydrophones.
(2) Simulations should be conducted prior to selecting the number and location of receivers to maximize accuracy (i.e., reduce confidence intervals) in the final configuration.[Footnote 30: There are several mathematical methods to improve the accuracy of localization estimates by reducing the confidence intervals for each parameter that should be follow. See Spiesberger J. 2022.]
(3) Systems should be calibrated before deployment to ensure accurate detection capability.
(4) For time-of-arrival based systems, synchronization of data streams from the multiple receivers is necessary for accurate calculations.
(5) Irrespective of the system used, careful testing and documentation of localization errors should be undertaken.
b) During pre-clearance and installation, monitoring of the visual clearance and exclusion zones must be undertaken by vessel-based PSOs stationed at the installation site. On each vessel, there must be a minimum of four PSOs following a two-on, two-off rotation, each responsible for scanning no more than 180 of the horizon per gravity-based or suction bucket foundation or floating offshore wind platform installation location. To effectively monitor the full exclusion zone for sea turtles, multiple PSOs must be stationed at several vantage points at the highest level to allow each to continuously scan a section of the exclusion zone. Ensure PSOs do not exceed two consecutive watch hours on duty at any time, have a two-hour (minimum) break between watches, and do not exceed a combined watch schedule of more than 12 hours in a 24-hour period. PSO schedules should be designed to minimize observer fatigue.
c) Acoustic and visual monitoring must be required, and monitoring must begin at least 60 minutes prior to the commencement of installation activity and must be conducted throughout the duration of installation. Visual monitoring must continue until 30 minutes after installation.
d) Additional observers and monitoring technologies (e.g., infrared, drones, hydrophones) must be deployed, as needed, to ensure the ability to monitor the established clearance and exclusion zones, including during periods of darkness or poor visibility.

Comment Number: BOEM-2024-0008-1070-0085
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

4) Require mandatory reporting of marine mammals and sea turtles detected during pre- clearance, installation, and 30 minutes after installation:
a) All visual observations and acoustic detections of North Atlantic right whales must be reported to NOAA Fisheries or the United States Coast Guard as soon as possible and no later than the end of the PSO shift. We note that, in some cases, such as with the use of near real- time autonomous buoy systems, the detections will be reported automatically on a pre-set cycle.
b) Observations of entangled, injured, or dead North Atlantic right whales, and other entangled, injured, and dead marine mammal species and sea turtles, must be immediately reported to NOAA Fisheries' Northeast Marine Mammal and Sea Turtle Stranding and Entanglement Hotline (1-866-755-6622) for states from Maine to Virginia; NOAA Fisheries' Southeast Marine Mammal Stranding Hotline (1-877-942-5343) or Southeast Sea Turtle Stranding and Salvage Network (1-844-732-8785) for states from North Carolina to Florida; [Footnote 31 or the United States Coast Guard via one of several available systems (e.g., phone, app, radio). Methods of reporting are expected to advance and streamline in the coming years, and projects should commit to supporting and participating in these efforts.
c) PSO sightings data must be submitted to BOEM as directed in any relevant guidance, site assessment plan (SAP) or construction and operations plan (COP) approval, or other agency protocol. Sightings data and reports provided to BOEM should be made publicly available by BOEM to inform marine mammal and sea turtle science and protection.

Comment Number: BOEM-2024-0008-1070-0086
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Noise mitigation recommendations for operations
1) Require operational noise reduction to the fullest extent practicable.
a) Operational noise should be reduced to the fullest extent practicable using best available technology and design principles. For example, direct-drive turbines should be used instead of gear-box turbines and engineering solutions should be used to acoustically decouple the turbine from the mast and platform whenever possible.
b) A detailed plan must be provided for how the operator will reduce operational noise output in the construction and operations plan submittal or in a separate plan submitted to BOEM and other relevant permitting agencies in advance of deployment.
c) Underwater sound source measurements must be conducted during operations. Plans for sound source measurements, including type and placement of equipment and frequency of measurements, must be fully described in construction and operations plan submittals. Sound source measurements should follow any available BOEM protocol.
d) Sound source measurements must be reported to BOEM as part of the annual certification required under 30 C.F.R. 285.633(a).
e) Sound source measurement reports must be made available to the public within one month after the report is submitted to BOEM.

Comment Number: BOEM-2024-0008-1070-0087
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Design floating offshore wind turbines to avoid entanglement risk:
a) Design and maintain mooring lines and inter-array cables in configurations that minimize the potential for entanglement of marine species by:
i)Ensuring that lines and cables remain under tension and avoiding catenary moorings; [Footnote 32: Marine species are more likely to become entangled in slack lines. "Taut mooring configurations are preferable because less slack in lines is likely to reduce entanglement potential (Benjamins et al. 2014). Highest relative risk may occur with catenary moorings given that the lines are not taut. Chains and nylon ropes are thought to have higher snagging potential, as do accessory buoys." Maxwell, Sara M., et al. 2022.]
ii)Burying inter-array cables, or establishing a minimum depth of 200 m for free floating inter- array cables (where burial of cables is not possible);
iii)Using large diameter (approximately 2 m) accessory buoys to stabilize catenary mooring lines and free-floating inter-array cables; and
iv)Employing large diameter wire rope or cable, and avoiding chains and synthetic fiber ropes, due to higher snagging potential.

Comment Number: BOEM-2024-0008-1070-0088
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Design infrastructure to facilitate visual or acoustic detection of ensnared marine debris by monitoring equipment and personnel, for example, by using lighter coloration or, for acoustic detection, textures to contrast with marine debris at depths where light is limited.
i) Infrastructure includes, for example, platforms, substations, mooring lines, inter-array cables, and anchors, as well as monitoring technology docking stations.

Comment Number: BOEM-2024-0008-1070-0089
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Conduct monitoring for entanglement that combines continuous and automated monitoring technologies with regular inspections and surveys of all floating offshore wind infrastructure throughout construction and operations:
a) Conduct continuous monitoring for strains on mooring lines and inter-array cables resulting from ensnarement of marine debris or entanglement of an animal.
i) Outfit all mooring lines with load cells [Footnote 33: "the Kincardine Floating Offshore Wind Farm in Scotland has integrated load cells with the mooring lines to periodically monitor line performance and potentially detect the entanglement of floating marine debris, including derelict fishing gear." SEER Educational Research Brief on Risk to Marine Life from Marine Debris & Floating Offshore Wind Cables Systems (p.5). https://tethys.pnnl.gov/sites/default/files/summaries/SEER-Educational- Research-Brief-Entanglement-Considerations.pdf.] with sufficient detection resolution to detect significant accumulations of secondary entanglement hazards and for entanglement events. Outfit all inter-array cables with

vibration and fault sensors, as well as load cells at all floating offshore wind turbine attachment points, and potentially at accessory buoy attachment points if present.

Comment Number: BOEM-2024-0008-1070-0090
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Conduct monitoring underneath each floating offshore wind platform sufficient to detect accumulated secondary entanglement hazards and marine species presence in and around the array.

Comment Number: BOEM-2024-0008-1070-0091
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Install multibeam systems with automatic detection capabilities, like the Biosonics Omnidirectional Marine Life Observer, installed facing down, underneath each individual floating offshore wind turbine. ii) Multibeam systems used should operate at peak frequencies above the range of marine mammal audibility and with no or minimal leakage of sound within the range of marine mammal audibility.

Comment Number: BOEM-2024-0008-1070-0092
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Conduct daily remote visual inspection of infrastructure for ensnarement of marine debris or entanglement of an animal [Footnote 34: Visual inspection at least once during each 24-hour period may provide an alert of an entangled marine mammal or sea turtle or diving or plunging marine bird at an early enough point in time that rescue efforts can be made, and the animal can be released alive.] at depths where marine debris is most likely to occur, which is usually zero to five meters from the surface.

Comment Number: BOEM-2024-0008-1070-0093
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Current suitable technologies for monitoring include cameras and remote aerial surveys.

Comment Number: BOEM-2024-0008-1070-0094
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Conduct monthly inspection of the full length of submerged infrastructure (including platforms, substations, mooring lines, inter-array cables, and anchors, as well as monitoring technology docking

stations or other infrastructure, as appropriate) for ensnared marine debris or entanglement of an animal.

Comment Number: BOEM-2024-0008-1070-0095
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Vessel deployed underwater autonomous vehicles (AUV) and remotely operated vehicles (ROV) can be outfitted with side-scan and multi-beam sonar transponders, and video cameras. [Footnote 35: ROVs may also be an important tool for marine debris removal at depth.

Comment Number: BOEM-2024-0008-1070-0096
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Outfit operations and maintenance vessels with equipment capable of locating and removing an entanglement hazard.
i) Vessels should be of sufficient size (40 feet or greater in length), have winches or cranes with load capacities suitable for commercial fishing, have equipment necessary to support both SCUBA and surface-supply air diving, and be able to accommodate launching, operating, and retrieving a working-class ROV.

Comment Number: BOEM-2024-0008-1070-0097
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Integrate floating offshore wind arrays into reporting systems tracking lost fishing gear, in order to improve response time to remove entanglement risks.

Comment Number: BOEM-2024-0008-1070-0098
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Adaptive use of inspection results.
a) Project proponents may propose an adaptive approach to scheduling inspections in COP submittals. Monthly inspections should be used to validate continuous monitoring approaches by confirming the location of ensnarement or entanglement events detected by a continuous monitoring system, or identifying events that were missed by such a system, during early application of the technology. If marine debris ensnarements or marine life entanglements are observed during these monthly inspections within the first 12 months of an offshore wind
project's operation, the frequency of full-infrastructure inspections should be increased. If monthly inspections detect no marine debris ensnarements or marine life entanglements during the first year of an offshore wind project's operation, the frequency of full-infrastructure inspections may be decreased.

Comment Number: BOEM-2024-0008-1070-0099
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Protocol when ensnarement and/or entanglements are identified: [Footnote 36: Protocol is adapted from the Federal Energy Regulatory Commission (FERC) Environmental Assessment for Hydropower License for the PacWave South Project (April 2020). https://www.boem.gov/sites/default/files/documents/regions/pacific-ocs-region/environmental-analysis/PacWave%20South%20EA.pdf.]

a) If monitoring shows that marine debris has become ensnared on any project structure, or that sharks and/or diving or plunging marine birds are entangled in marine debris ensnared on any project structure, the lessee must notify the National Marine Fisheries Service (NMFS) or U.S. Fish and Wildlife Service (USFWS), as appropriate, the U.S. Coast Guard, and the relevant state agency as soon as possible and within 6 hours of detection. If the appropriate federal and state agencies determine that the lessee should remove the marine debris and any entangled sharks or diving or plunging marine birds, or any other species, the lessee shall take such action as soon as is possible to do so, in a manner that does not jeopardize human safety, property, or the environment.
b) If monitoring shows that marine mammals or sea turtles are entangled in marine debris ensnared on any project structure, the lessee shall immediately follow the Reporting Protocol for Injured or Stranded Marine Mammals or the sea turtle reporting protocol developed by the Sea Turtle Disentanglement Network; and provide the federal and relevant state agencies with all available information on the incident. [Footnote 37: See National Marine Fisheries Service Large Whale Entanglement Response Program for whale entanglement reporting protocol, Greater Atlantic region: https://www.fisheries.noaa.gov/new-england-mid-atlantic/marine-life- distress/marine-mammal-entanglement-greater-atlantic-region; Sea Turtle Disentanglement Network for sea turtle reporting protocol: https://www.fisheries.noaa.gov/new-england-mid-atlantic/marine-life-distress/sea- turtle-disentanglement-network).]

Comment Number: BOEM-2024-0008-1094-0011
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

Proposed action fails to prioritize the role of the ocean in tempering climate change and fails to evaluate, assess and mitigate negative impacts on the ocean.

Proposed action fails to recognize role of the ocean in the entire scheme of biodiversity and fails to evaluate, assess and mitigate negative impacts on biodiversity.

Comment Number: BOEM-2024-0008-1106-0026
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

Avoidance, Minimization, Mitigation, and Monitoring Measures
In addition to alternatives, the EIS must evaluate mitigation measures to avoid and minimize impacts to NOAA trust resources. As described in the NOAA Mitigation Policy for Trust Resources (NAO 216-123, Section 3.06) impact avoidance and minimization must be considered and fully and fairly evaluated

through the alternative development process before compensatory mitigation is considered; this is known as the mitigation sequence. This step-wise approach first focuses on the avoidance of adverse impacts, followed by the incorporation of minimization measures, limiting the degree and magnitude of adverse impacts. The mitigation sequence is clear in that compensating for unavoidable adverse impacts should be viewed as mitigation of last resort. This mitigation strategy is also addressed in the BOEM and NOAA Fisheries North Atlantic Right Whale and Offshore Wind Strategy [Footnote 9: https://www.boem.gov/sites/default/files/documents/environment/BOEM_NMFS_NARW_OSW_0.pdf]. As described in the NOAA Mitigation Policy, the level and type of uncertainty associated with compensatory mitigation may warrant increased amounts of compensation to assure that impacts are sufficiently offset.

Comment Number: BOEM-2024-0008-1106-0027
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

Further, the EIS must clearly identify which mitigation measures are included as part of the proposed action and thus evaluated in the analysis, which measures are proposed as required, and which measures are optional and could be implemented by the developer at their discretion. The document should provide information on how mitigation measures are considered in the context of the effects level (negligible, minor, moderate, major), how mitigation would offset those levels, and the effectiveness of any proposed mitigation.

Comment Number: BOEM-2024-0008-1106-0028
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

Based on the habitats and resource concerns in the Project area as outlined above, we have included a preliminary list of avoidance, minimization, mitigation, and monitoring measures we recommend be evaluated in the EIS. Additional mitigation measures may also be identified through future review and consultations for this ASOW North project. Given the proximity of this project to the Atlantic Shores Offshore Wind (ASOW) South project and the Ocean Wind Project, we also recommend you consider the mitigation measures identified in the ASOW South FEIS and Ocean Wind and conditions of COP Approval, the Biological Assessment (BA), the Biological Opinion's Incidental Take Statement (BiOp ITS), the MMPA Incidental Take Authorization, and the Essential Fish Habitat (EFH) consultation. We also recommend that you consider the mitigation measures that have been developed as part of programmatic efforts related to the New York Bight leases and the mitigation measures included in the BOEM and NOAA Fisheries North Atlantic Right Whale and Offshore Wind Strategy. The following is a preliminary list of mitigation measures we recommend be considered and evaluated in the EIS.

Comment Number: BOEM-2024-0008-1106-0029
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

- Measures to avoid and minimize exposure of protected species to project noise:
- Consideration of foundations that do not require pile driving

- Time of year restrictions that would avoid pile driving and UXO/MEC detonations during the months when the density of North Atlantic right whales is highest in the lease area; these should be based on the best available scientific data for the lease area and surrounding waters and consider how to minimize exposure of pregnant females and mother-calf pairs as they make coastal migrations.
- Minimum visibility, clearance, and shutdown requirements with visual and passive acoustic monitoring for pile driving and UXO/MEC detonations
- Soft start requirements for pile driving
- Use of best available technology to maximize sound attenuation (e.g., double bubble curtains)
- Adherence to best practices to avoid and minimize exposure to noise from geophysical survey activities

---

Comment Number: BOEM-2024-0008-1106-0030
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

- Measures to avoid and minimize interactions with protected species during fisheries surveys:
- Eliminating vertical lines, including requirements for ropeless/on-demand technology for any trap/pot surveys
- Minimizing tow time for trawl surveys to 20 minutes or less
- Restricting use of gillnets to times and areas where protected species do not occur
- Measures to avoid and minimize risk of vessel strike:
- Vessel speed restrictions (10 knots or less) for vessels of all sizes operating in areas and times when whales are expected to be present
- Requirements for lookouts and monitoring frequently used vessel transit corridors
- Measures to reduce potential for strike of sea turtles and Atlantic sturgeon
- Measures to avoid and minimize impacts to sensitive habitats:
- Avoid development within ecologically sensitive habitat areas including tidal wetlands, SAV (especially seagrasses), and areas with emergent fauna (corals, tube- dwelling anemones, structure forming polychaetes) as well as other complex habitats in the project area
- Avoid and minimize development in the lease area that would require the removal/flattening of sand bedforms, such as sand waves, lumps, banks, and ridges.
- Incorporate measures to avoid and minimize direct and indirect impacts to complex and sensitive habitats (e.g., hard bottom, seagrass, shellfish reefs) and benthic features at the project planning stage. Plans for minimizing adverse impacts from UXO avoidance/removal/detonation, boulder relocation, anchoring, and micrositing of foundations and cables should be considered elements of the proposed action and thus analyzed in the EIS.

Comment Number: BOEM-2024-0008-1106-0031
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

- Measures to minimize impacts to EFH and early life stages:
- Time of year restrictions: Depending upon the location and in-water activities, seasonal in-water work restrictions for export cable construction may include: November to June for blue crab, winter flounder, striped bass, and other diadromous fish along and adjacent to the export cable route in New York and New Jersey state waters west of the Sandy Hook peninsula.
- Noise mitigating measures for any pile driving activities including soft start requirements and use of best available technology to maximize sound attenuation (e.g., double bubble curtains)

- Require closed loop cooling system for any HVDC converter stations to minimize entrainment of plankton, eggs, and larvae and avoid/reduce discharge of heated effluent
- Measures to minimize and mitigate impacts to fishing operations and communities:
- Avoid and minimize development within areas of high fishing activity
- Maintain sufficient cable burial depth to reduce inter-array and export cable exposure and conflicts with hydraulic clam dredge operations and potential adverse impacts from EMF and heat.
- Mitigation should be considered in the EIS for impacts to surfclam habitat that cannot be avoided. Adoption of stock enhancement measures for unavoidable impacts to fishery operations, such as surfclam seeding initiatives outside of the lease area to offset loss of access to fishable surfclam biomass within the lease area. Stock enhancement mitigation measures should be directly informed by the concentrations of fishing activity and available biomass within the area infeasible for avoidance.
- Details of any fishery compensation plan(s) to mitigate fishery economic impacts from access loss/restriction, effort displacement, or gear damage/loss, including a description of compensation fund amount and associated basis; fund administrator; and compensation claims process, including eligibility criteria, application window, information requirements for submitting claims, claim frequency, claim review criteria, appeals procedures, and other other details, as appropriate should be included when possible, particularly if used.
- Mitigation necessary to offset negative impacts to longstanding marine scientific survey operations (e.g., loss of access to the Project areas, changes to sampling design, habitat alterations, and reduced sampling due to increased transit time) consistent with the NOAA Fisheries and BOEM Federal Survey Mitigation Implementation Strategy [Footnote 10: Available at: https://repository.library.noaa.gov/view/noaa/47925];

Comment Number: BOEM-2024-0008-1106-0032
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

Monitoring
We recommend the Project develop a program for monitoring at multiple scales, taking an ecosystem-based approach for fisheries, habitat, and protected species. This will be important in assessing impacts of the Project, the cumulative impacts of Project development and informing any future development. It is imperative that project-specific monitoring efforts are integrated into existing regional monitoring programs throughout the OCS and, when appropriate, project- or location- specific research questions, explicit to characteristics and dynamics unique to the project site and relevant to trust resources management, be incorporated into monitoring activities. We recommend BOEM and Atlantic Shores coordinate with our agency early in the process regarding any potential effects of monitoring activities on NOAA trust resources as survey or monitoring activities may require permits or authorizations.

Comment Number: BOEM-2024-0008-1106-0033
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

In the development of monitoring programs for NOAA trust resources; to achieve the objective of reducing uncertainty around potential impacts from development on trust resources, with the goal of understanding Project effects and informing future project design and requirements, we recommend BOEM require some fundamental survey design elements at the project level.
Specifically, when appropriate given initial survey design (BACI or BAG), we recommend regional

coordination between leases and developers for the identification of regionally representative control areas, outside of the zone of potential impact. Further, the temporal scale of sampling should include a minimum of 3 years of pre-construction data collection to establish the baseline of natural variability within the system and annual sampling for a minimum of 5 years once construction begins.

Comment Number: BOEM-2024-0008-1106-0034
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

We recommend the monitoring plans include a mix of project-focused, regionally-focused, and species-focused surveys. Project-focused surveys should include long-term passive monitoring of the project area pre- and post- construction to investigate changes in ecosystem dynamics over time, as well as the evaluation of changes in habitat quantity and quality within the lease area as a result of project development. Specifically, project-focused habitat surveys should quantify the extent that each habitat type identified during site assessment and characterization activities has been converted or fragmented across the lease area. We also recommend the change in functional value of the ecosystem services provided by each present habitat type be evaluated in tandem with the results from species specific, IPF-focused surveys to elucidate how project related impacts alter the available habitat and how species present in the lease area respond to those habitat changes. We recommend that regional surveys include resource abundance and distribution surveys (for fisheries and habitat), while species specific studies focus on the response (biological, behavioral, or otherwise) of commercially and ecologically important and representative species of the region to specific impact producing factors resulting from project development.

Comment Number: BOEM-2024-0008-1109-0005
Commenter Type: Advocacy Group
Commenter: Marlene Asselta
Organization: Southern New Jersey

Comment Excerpt Text:

We believe that Atlantic Shores has completed responsible siting and design and has proposed reasonable and necessary measures to avoid, minimize, or mitigate potential effects or impacts to the environment, communities, and coastal and ocean users.

A.3.16 Navigation and Vessel Traffic

Comment Number: BOEM-2024-0008-0138-0011
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

The COP fails to demonstrate that the project will not impose navigation risk to a unique NJ situation with turbines close in and farther out in the NY Bight-will cause the channeling of all commercial and military vessels into a 9-mile-wide strip between the NJ lease area and the Hudson South area, which also happens to be a migration corridor for the endangered right whale. Marine radars potentially compromised by turbines on both sides.

Comment Number: BOEM-2024-0008-0517-0005
Commenter Type: Individual
Commenter: Donna Lafleur

Comment Excerpt Text:

More reasons of concern are navigation, sonar, and radar for boaters, ships and Fisherman making it a navigational nightmare especially at night.

Comment Number: BOEM-2024-0008-0546-0002
Commenter Type: Individual
Commenter: S W

Comment Excerpt Text:

Fisherman will die when their boats inadvertently collide with these things in a storm due to no radar signal.

Comment Number: BOEM-2024-0008-0558-0008
Commenter Type: Individual
Commenter: Tony Moutinho

Comment Excerpt Text:

and cause loss of human life as boats try to steer around these structures in bad weather and at night.

Comment Number: BOEM-2024-0008-0562-0005
Commenter Type: Individual
Commenter: James Ulrich

Comment Excerpt Text:

Moreover, the risk of entanglement or collision with turbine blades presents a direct danger to these vulnerable species, further endangering their populations.

Comment Number: BOEM-2024-0008-0599-0006
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

Project structures also would pose an allision and height hazard to vessels passing close by, and vessels would, in turn, pose a hazard to the structures.

Comment Number: BOEM-2024-0008-0631-0002
Commenter Type: Business/Trade Association
Organization: American Waterways Operators

Comment Excerpt Text:

This EIS should assess the increased risk of siting wind turbines directly alongside the narrow inshore safety fairways. The Atlantic Shores North lease area sits between two Coast Guard-proposed safety

fairways. While the St. Lucie to New York fairway to the east is over the 9 nautical mile width needed to ensure safe navigation, the New Jersey to New York Connector fairway to the west is closer to 5 nautical miles. Without the recommended 2 nautical mile buffer between the edge of this fairway and the offshore wind lease, vessels along with their crews and cargo are at a greater risk of allision with an offshore wind structure. Navigable areas will become more congested as existing vessels are forced to use less space and new vessels begin to service offshore wind areas. A constricted 5-mile fairway will drastically increase the chance of allisions with wind turbines and collisions with other vessels, especially during inclement weather.

Comment Number: BOEM-2024-0008-0631-0003
Commenter Type: Business/Trade Association
Organization: American Waterways Operators

Comment Excerpt Text:

This EIS should also examine how the planned cable corridors and burial depths will increase the risk of anchor strikes. The offshore export cables as laid out in the construction and operations plan (COP) run through sensitive navigation corridors and do not meet depths necessary to ensure safe navigation. Both the Monmouth Export Cable Corridor and the Northern Export Cable Corridor appear to run through safety fairways, a precautionary area, and a traffic separation scheme as they approach land. Wherever undersea cables must cross navigation corridors, they should do so perpendicularly while being buried 15 feet deep. The COP targets burial depths at 5 to 6.6 feet, well below the standard to avoid damage from an anchor strike.

Comment Number: BOEM-2024-0008-0813-0008
Commenter Type: Individual
Commenter: Laurie Maxwell

Comment Excerpt Text:

The impact of the amount and placement of these mammoth turbines as close as 8 miles from shore create a safety hazard to boaters, shipping lanes and coast guard rescue missions.

Comment Number: BOEM-2024-0008-0900-0006
Commenter Type: Individual
Commenter: Roslyn McGivney

Comment Excerpt Text:

*national security- leasing out hundreds of thousand of our ocean floor to foreign countries that will control our power grid is absurd! Turbines cause intermittent radar signals- navigation will be disastrous! *

Comment Number: BOEM-2024-0008-0922-0005
Commenter Type: Individual
Commenter: John Maxwell

Comment Excerpt Text:

The impact of the amount and placement of these mammoth turbines as close as 8 miles from shore create a safety hazard to boaters, shipping lanes and coast guard rescue missions.

Comment Number: BOEM-2024-0008-0934-0001
Commenter Type: Individual
Commenter: Tiffany Strout

Comment Excerpt Text:

The turbines are also known to cause navigational issues which puts the safety of those at sea in danger of crashing in inclement weather when radar is required and also of being rescued by the Coast Guard or another boat if there is imminent danger.

BOEM being the only entity with final approval on these auctions should be able to be sued by survivors of anyone who loses their lives due to the interference they cause with the navigation.

Comment Number: BOEM-2024-0008-0984-0003
Commenter Type: Individual
Commenter: Virginia Renehan

Comment Excerpt Text:

Magnets used in turbines are a Hazzard to navigation.

Comment Number: BOEM-2024-0008-0985-0003
Commenter Type: Individual
Commenter: Tony Alexander

Comment Excerpt Text:

Aviation and boating impacts. Ever try to navigate a boat in the fog?

Comment Number: BOEM-2024-0008-0996-0002
Commenter Type: Individual
Commenter: Apostolos Gerasoulis

Comment Excerpt Text:

In 2023, the traffic related to offshore wind surveying was three times the average from 2015-2023, coinciding with an increase in whale deaths by a factor of 10 compared to pre-2015 levels. Survey vessels often employ sub-bottom profilers that emit sonar signals at 226 dB. Such intense acoustic emissions are known to cause temporary or permanent hearing loss in cetaceans, potentially leading to disorientation, panic, and fatal accidents in deep water environments.

Comment Number: BOEM-2024-0008-1007-0011
Commenter Type: State Government
Organization: New York State

Comment Excerpt Text:

b. Evaluate different alignments to the potential cable corridors to minimize the area that cables would occupy within existing and proposed traffic routes, including the Coast Guard's proposed Fairways rulemaking{{Footnote 7: 89 FR 4320. Shipping Safety Fairways Along the Atlantic Coast}} and other industry best practices.

Comment Number: BOEM-2024-0008-1007-0015
Commenter Type: State Government
Organization: New York State

Comment Excerpt Text:

5. Evaluate potential impacts to New York maritime activities and port communities due to restricted access from increased project vessels and construction activities. The COP notes three (3) existing New York port facilities which may be utilized during construction of the project (Table 4.10-2), including Arthur Kill Terminal in Staten Island, NY, and Port of Albany and Port of Coeymans Marine Terminal along the Hudson River. Potential use conflicts, safeguarding navigational safety, and evaluation of potential impacts to New York's communities, including Environmental Justice and low-income communities should be considered in the EIS. A comprehensive mariner communication plan that addresses all phases of project development, from surveys to decommissioning, is necessary to ensure sufficient outreach and engagement. The Agencies also recommend referring to analyses from NYSERDA's offshore wind ports cumulative studies of potential environmental impacts and vessel traffic assessment.{{Footnote 10: Source: https://www.nyserda.ny.gov/All-Programs/Offshore-Wind/Focus-Areas/Supply-Chain-Economic-Development/500M- Investment}}

Comment Number: BOEM-2024-0008-1008-0005
Commenter Type: Individual
Commenter: John Casagrande

Comment Excerpt Text:

The deployment of offshore wind turbines also creates a hazard to navigation, impacting commercial shipping, recreational and commercial fishing vessels, and coastal patrol and defense forces.

Comment Number: BOEM-2024-0008-1029-0011
Commenter Type: Individual
Commenter: Douglas Crawford

Comment Excerpt Text:

Offshore Wind Farms Can Interfere with Ship Radar and Navigation, Says New Report
"The report concludes wind turbine generators have significant electromagnetic reflectivity, and therefore can interfere with radar systems operating nearby. The rotating blades can also create reflections in Doppler radar systems. In particular, these forms of interference could obfuscate smaller vessels and stationary objects such as buoys on radar, complicating navigation decisions and increasing the risk of collision with larger vessels. Maritime search and rescue teams also rely on radar to find smaller boats their primary targets and interference could therefore also complicate rescue operations near wind farms.. The report recommends the Bureau of Ocean Energy Management and other relevant agencies pursue practicable options to mitigate the interference of wind farms, such as by implementing enhanced training and using reference buoys, among other options. The agency should also pursue further research to fill remaining gaps in understanding how offshore wind farms affect radar used for navigation.

Comment Number: BOEM-2024-0008-1070-0056
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Service operating vessels that host construction workers and technicians for multiple days at sea reduce the pressure on limited transit times between the port and the lease area and can help developers meet speed requirements.

Comment Number: BOEM-2024-0008-1122-0005
Commenter Type: Individual
Commenter: Anonymous

Comment Excerpt Text:

THEY POSE RISKS TO NAVIGATIONAL SAFETY AND NATIONAL SECURITY

Destruction by a natural disaster, sabotage, or war, leaving us without power

- Risk to navigational safety and USCG search and rescue

Comment Number: BOEM-2024-0008-1172-0003
Commenter Type: Advocacy Group
Commenter: Carl Van Warmerdam
Organization: Deep Sea Defenders

Comment Excerpt Text:

In the planning, you eliminated shipping lanes, so no wind turbines in the shipping lanes, so you are going to put them in where the whales are because the whales won't be going in shipping lanes but once you start putting these turbines in, where will the whales have to go, well, they will have to go into the shipping lanes and then they get a ship strike and a kill and that's what is going on right now. And so you say, oh, well, wind turbines are not killing the whales, no, but the activity caused the whales to go into the shipping lanes.

So it's not a direct link which you can say, oh, yeah, that's not a direct link but what caused them to go into those -- to get a ship strike, death by ship strike, so these are -- and these are endangered species, the North Atlantic Right Whale, so how is it you can say that that's okay? That you can go ahead and kill a species, and a magnificent species, I might say iconic.

A.3.17 NEPA/Public Involvement Process

Comment Number: BOEM-2024-0008-0005-0001
Commenter Type: Individual
Commenter: James Binder

Comment Excerpt Text:

An "in person" public hearing will not be conducted on LBI, the nearest and most heavily impacted area. Asbury Park is some 30 miles away, and Staten Island and Brooklyn some 100 miles away from the location of the windmills and substations. The windmills will be located as close as 9 miles off the beaches of LBI. Please hold an in person public hearing on LBI so that the impacted residents and local elected officials can make comments in person.

Comment Number: BOEM-2024-0008-0008-0002
Commenter Type: Individual
Commenter: Robert Maryott

Comment Excerpt Text:

Please consider holding a vote or live events to listen to those who will be adversely affected by these industrial structures.

Comment Number: BOEM-2024-0008-0008-0003
Commenter Type: Individual
Commenter: Robert Maryott

Comment Excerpt Text:

The chosen location was never discussed with residents and more importantly with experts who have put forth well documented evidence that massive wind farms will harm the environment.

Comment Number: BOEM-2024-0008-0066-0004
Commenter Type: Individual
Commenter: Robert Ankosko

Comment Excerpt Text:

Let me start by saying shame on you BOEM for not holding an Open House Public Meeting on or near LBI, the community that will be directly impacted by the massive industrial complex (OCS-A 0549) Atlantic Shores North is seeking to build in the ocean, the pristine ocean, a mere 8 miles off the coast of LBI.

Comment Number: BOEM-2024-0008-0081-0001
Commenter Type: Individual
Commenter: Patrick Cozza

Comment Excerpt Text:

Why in God's name are the in person comment locations in New York???? Insane. Of course we know why, they DON'T want local constituents commenting on the proposal in person. I'm sure the LBI hotel would gladly host the event.

Comment Number: BOEM-2024-0008-0138-0015
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

The information presented in the few public meetings offered by BOEM was nothing but a cursory review of the process and documents. Critical information in the documents and appendices was not even mentioned and some information was misrepresented. The opportunity to ask questions in the zoom public comment meetings was limited because if a BOEM representative answered the question incorrectly or insufficiently, there was no opportunity for the participant to respond with a follow up question.

Comment Number: BOEM-2024-0008-0138-0016
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

The process lacks any effective process to engage with second homeowners. 37% of New Jersey shore town homes are owned by OUT-OF-STATERS. When asked about sending postcards to primary addresses which are easily obtained from County tax record systems, a BOEM team member said that they did not have the budget to do this. Downloading a tax system file and sorting second home owner property information costs nothing. Printing and mailing post cards costs less than 60 cents a piece and for second homeowners in Atlantic County the total cost would be less than $10,000.

Comment Number: BOEM-2024-0008-0138-0017
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

The process lacks any funding for local communities to hire experts to guide them through the process. BOEM relies on local governments to inform or educate their communities about the projects. It is not a requirement or job of our local governments to do this it is the requirement of BOEM to educate the public. Local government lacks the knowledge or resources to educate the public. An advertisement in a few papers along with press releases were used to notify the public. It is not the media's responsibility to print press releases or post them on social media. BOEM can't guarantee that information in press releases is reported correctly.

Comment Number: BOEM-2024-0008-0138-0018
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

The timing and number of public information sessions is totally inadequate for community members to grasp an understanding of the information in the documents and process. BOEM has failed to use any measurement to determine the effectiveness of their public outreach efforts. What are the counts of citizens participating in the meetings and public comment sessions compared to the millions of citizens this will impact? What are the counts of disadvantaged or protected classes of citizens attending public input sessions? What actions are taken if the participation fails to meet the criteria for evaluating effective public outreach.

Comment Number: BOEM-2024-0008-0138-0002
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

Second, given the lack of time given for a reasonable member of the public to read and assess all the pages of information in the COP, its appendices; the lack of time to read pages of cited scientific studies used to make decisions on the projects impact which the general public does not have access to without paying for the documents on research websites; the lack of a COP document in language of minority population; the lack of public meetings in areas that will be negatively impacted in Atlantic County, we,

therefore, want to put on the record that as we identify other issues in the COP, or other related documents, we reserve the right to provide public comment to BOEM or other agencies overseeing this project and/or raise legal objections concerning those issues in addition to issues raised in this public comment document. We are also officially requesting at least a six-month extension of the public inspection and comment period for these and other reasons mentioned in this document. Our opinion is that the level of deficiencies in the current ASOWNJ COP and COP process are so high that the report should be disqualified from being used in the permitting process.

Comment Number: BOEM-2024-0008-0452-0001
Commenter Type: Individual
Commenter: Michael Lang

Comment Excerpt Text:

This project is movong forward without the care of the local people who will be impacted. There were NO meetings held on LBI where the greatest impact will be felt.

Comment Number: BOEM-2024-0008-0491-0005
Commenter Type: Individual
Commenter: James Snyder

Comment Excerpt Text:

BOEM has launched the east coast windmill projects more or less on a stealth basis. BOEM quietly leased out the development areas many years ago, locking in the locations of these projects, before any forthright and public disclosure of the size, scale and scope of the projects. As proof of this, can BEM say whether they have ever held a public meeting on the Atlantic Shores project on Long Beach Island? The answer is no.

Comment Number: BOEM-2024-0008-0491-0008
Commenter Type: Individual
Commenter: James Snyder

Comment Excerpt Text:

The environmental impact has not been fully assessed. The Atlantic Shores Project is merely one element of a much larger array of projects focused on the entire East Coast of the United States. The migratory paths of protected animals overlap the footprint of these projects, taken as a whole. And yet, there does not seem to be any cumulative environmental assessment of these projects taken as a whole.

Comment Number: BOEM-2024-0008-0524-0001
Commenter Type: Individual
Commenter: Sharon Mahoney

Comment Excerpt Text:

With these turbines being proposed just 8 miles off our shoreline, it is unfathomable that there is no in person meeting with BOEM and the residents of LBI. The nearest in person meeting location was over 50 miles away from LBI. We request an in person meeting on LBI or in Manahawkin.

Comment Number: BOEM-2024-0008-0538-0002
Commenter Type: Individual
Commenter: Mary Smith

Comment Excerpt Text:

The EIS reports are so long that the average, working US citizen cannot fathom reading them.

Comment Number: BOEM-2024-0008-0550-0005
Commenter Type: Individual
Commenter: AJ Conte

Comment Excerpt Text:

I respectfully request that BOEM reconsider moving forward with the EIS for the Atlantic Shores North Project and explore alternative, less disruptive means of achieving our renewable energy goals and I urge an extension to the public comment period.

Comment Number: BOEM-2024-0008-0551-0001
Commenter Type: Advocacy Group
Organization: RODA

Comment Excerpt Text:

RODA has repeatedly stated that BOEM's current approach of flooding the public with comment periods, while ignoring requests for transparency and authentic co-design, prevents meaningful engagement thereby putting at risk the achievement of sustainable and environmentally conscious renewable energy production. RODA has consistently, for years, offered specific requests to BOEM to improve communication, safety, transmission planning, research, cumulative effects analyses, seafood business longevity, and environmental impacts. These requests are available on the RODA website [Footnote 2: https://rodafisheries.org/offshore-wind/] and BOEM should address them and forge working relationships with this constituency that provides food security to our nation throughout the development of this EIS and other actions.

One clear indicator of the ineffectiveness of this approach is that fundamental Atlantic Shores North Project decisions are already being made and discussed at the local, state, and business levels, which entirely narrow the range of alternatives that BOEM will consider in this EIS. Yet, reading the NOI, most members of the public would incorrectly assume that the project is still in a high-level planning phase with the COP being a mere proposal for which BOEM would consider many options to modify. Regardless of the private plans being made by the project applicant, we again urge BOEM to develop a comprehensive planning process, remove segmentation that serves to marginalize fisheries, and consider OSW planning options from an impartial standpoint.

Comment Number: BOEM-2024-0008-0551-0002
Commenter Type: Advocacy Group
Organization: RODA

Comment Excerpt Text:

It is imperative for BOEM to publish all matters of public interest in the Federal Register, in accordance with its own past practice (until recently), standard practice at other agencies, and the law. This is especially important given BOEM's decision to conduct stand-alone NEPA reviews for the large number

of OSW projects undergoing permitting rather than adopt a programmatic approach. It is extremely difficult for impacted parties and other members of the public to follow an individual project through its evolution, and consistent dockets within the Federal Register are a minimum necessary tool toward that end.

Comment Number: BOEM-2024-0008-0551-0020
Commenter Type: Advocacy Group
Organization: RODA

Comment Excerpt Text:

OSW-related activities, which have not undergone mandatory environmental review, are already occurring in the lease area where the Atlantic Shores North project and others are proposed. These activities must be considered, analyzed, and authorized under appropriate NEPA practices including a Programmatic EIS.

Comment Number: BOEM-2024-0008-0551-0006
Commenter Type: Advocacy Group
Organization: RODA

Comment Excerpt Text:

RODA again calls upon BOEM to develop suitable Programmatic Environmental Impact Statements by region, with tiered analyses for individual projects or contiguous lease areas. This is the only approach that will both meet NEPA's requirements and allow for effective public comment opportunity. Fishermen, scientists, managers, and other non-OSW professionals simply cannot provide meaningful comments on each individual project BOEM plans to review in the near term. Without the ability to provide consolidated reviews and comments, the quality of decision making and project planning and the ability to find suitable mitigation measures will be strongly jeopardized.

Comment Number: BOEM-2024-0008-0565-0001
Commenter Type: Individual
Commenter: Jason Dragseth

Comment Excerpt Text:

I encourage BOEM to conduct a thorough but efficient review process. New York has a nation-leading climate law that requires our state to develop 9,000 MW of clean, offshore wind power by 2035, and we need the federal government to move quickly to help us meet this mandate. New York enacted such an ambitious climate law because burning fossil fuels to produce energy is causing climate change and devastating our natural habitat and our communities, and creating massive toxic emissions that are harming our health. We want to protect ourselves from the dangers of climate change and toxic emissions, and the sooner we develop clean, offshore wind power the better for New Yorkers.

Comment Number: BOEM-2024-0008-0567-0001
Commenter Type: Individual
Commenter: Maryanne Klemmer

Comment Excerpt Text:

As a resident of Margate City, New Jersey, I am concerned with the Governor revisiting the plan for The

Atlantic Shores Wind Project, which recently pulled out of its Maryland investment.

I attended the Congressional Hearing in Wildwood, NJ March 16, 2023. And live streamed the recent hearings in Ocean City, MD January 20, 2024. I am sure you are aware of both Congressional Hearings.

Comment Number: BOEM-2024-0008-0579-0003
Commenter Type: Individual
Commenter: Daneen Osten

Comment Excerpt Text:

When you do your EIS, please evaluate the following factors:
1. Evaluate the impact to humans, pets, and marine life. We will hear and see their blades move and blinking lights. This cannot be good for our physical and mental health. Dogs have more sensitive hearing than we do, and then of course there is huge concern on whales, dolphins, and fish.
2. Evaluate where "non-clean" energy will be reduced if these turbines come to life. The impacts to that industry and economy need to be considered as well.
3. Evaluate/test what will happen to the turbines during a hurricane. Really scary being that close to shore.
4. Evaluate where the power produced from the turbines will go. Where it goes is supposed to absorb the costs, but LBI will be stuck looking at them, possibly with no benefits reaching LBI.
5. Evaluate the economic impact to LBI. This will be terrible. No one will want to come anymore, Businesses will go out of business and property values will tank. The "benefits" of the turbine field are not worth all the negatives that will happen if it proceeds. We should not rob Peter to pay Paul. If you have nto been to LBI before, reach out to me and I will take you around.
6. Evaluate what are the possibilities if no testing is done, and then they don't work as planned across multiple aspects. Scientists test.

Comment Number: BOEM-2024-0008-0599-0008
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

The EIS will analyze all significant impacts, as well as potential measures that would avoid, minimize, or mitigate identified non-beneficial impacts.

Comment Number: BOEM-2024-0008-0611-0001
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

Work on an EIS should not proceed until the environmental review is complete and adequate for the Site Assessment Plan. The prior environmental assessment (EA) for the area is no longer valid. It needs to be updated to match the current vessel surveys and incidental harassment authorizations (IHA's) being approved by the National Oceanic and Atmospheric Administration(NOAA).

The geographical area covered by the prior EA is much smaller than current survey areas being approved by NOAA. The prior EA relied on an assessment of boomer and chirper devices with lower noise source levels than the measured levels for the sparker units being employed now. The boomer and chirper systems are also directional, concentrating their energy in a direction as opposed to the sparker units which spread their noise energy in all directions, thus affecting more animals. The prior EA did not

address the cumulative effect of multiple vessel surveys now being conducted in the same area at the same time. Finally the EA does not address the evidence of correlation of recent wind survey vessel activity with the unpresented spate of whale deaths along the NJ and NY shores.

The EA needs to address those whale deaths. The BOEM and NOAA continue to ignore the evidence of correlation of the vessel surveys with the whale deaths that has been placed into the record. Evidence was provided by Save LBI in its detailed comments on the draft EIS for the Atlantic Shores South project and confirmed by measurements by Rand Acoustics, Inc. (Sonar vessel noise survey, technical report, September 22, 2023) that the noise source levels being assumed by the BOEM and NMFS are underestimated. Evidence has been provided that the noise propagation loss factor of 20 decibels (dB) per decade distance assumed by BOEM and the NOAA is too high and not consistent with the physical science of noise propagation in relatively shallow waters, nor with prior measurement studies. Evidence has been provided that the places of the whale deaths are correlated with survey vessel presence. Evidence has been provided the sparker units used here are similar to air guns in terms of the noise energy propagating horizontally where most of the animals are, and therefore the BOEM and NOAA cannot dismiss the evidence of many worldwide events involving marine mammal deaths and air gun use. A summary of the evidence is provided in Enclosure III.

The BOEM and NOAA cannot dismiss this problem with repeated but unsupported statements that there is no evidence of a connection. The BOEM either needs to show its evidence that there is no evidence, or look at the evidence and revise the EA substantially.

Comment Number: BOEM-2024-0008-0611-0014
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

The Outer Continental Shelf Act, U.S. Code 1334(a) requires that;(2) with respect to cancellation of any lease or permit--(A) that such cancellation may occur at any time, if the Secretary determines, after a hearing, that(i) continued activity pursuant to such lease or permit would probably cause serious harm or damage to life (including fish and other aquatic life), to property, to any mineral (in areas leased or not leased), to the national security or defense, or to the marine, coastal, or human environment;(ii) the threat of harm or damage will not disappear or decrease to an acceptable extent within a reasonable period of time; and (iii) the advantages of cancellation outweigh the advantages of continuing such lease or permit in force.

Serious harm or damage from this project is faced from many quarters. Imminent harm and damage is faced from vessel surveying and pile driving noise to marine mammals, from pile driving seabed vibration to now submerged ancient archeological resources, and from shore visible, noise, and local climate changes. Long term harm is faced to marine life from turbine operational noise, to vessel safety from passage restrictions, and to military capability from air radar interference. Extremely long term harm is faced to the entire marine ecological system if the turbines are not removed at the end of their useful life.

Comment Number: BOEM-2024-0008-0611-0016
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

In contrast to a proper robust selection of real alternatives to this project, the NOI inappropriately limits the scope of the Atlantic Shores North project EIS only to the project that the applicant has proposed.

Comment Number: BOEM-2024-0008-0611-0002
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

The BOEM should extend the comment period on the NOI and hold a genuine public hearing on Long Beach Island with BOEM management in attendance, so that they can hear directly the many valid concerns of residents, visitors and others. The failure to do so is unconscionable with a project of such great concern to thousands of people, and would simply confirm the BOEM's capricious attitude with respect to its approval of these projects. A statement was made at the April 16th scoping meeting that such a hearing would be considered at the draft EIS stage, but that is too late to alter the fundamental scope of the EIS.

Comment Number: BOEM-2024-0008-0611-0003
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

Before we discuss the NOI EIS scope, let look at what the purpose of an EIS is. If it's just to describe the impacts of a particular single proposal and then move on then what's the point? That isn't its purpose. The NEPA requires that a federal agency prepare a detailed EIS on every major federal decision it makes that significantly affects the quality of the human environment. What the Congress wanted out of the requirement to prepare EISs was for agencies to stop and think about alternative ways of accomplishing their mission with less environmental harm and project delay. So the real purpose of doing an EIS Is to track the decisions that the agency is making and whatever options were open to it, those same options and their environmental impacts should appear in an EIS for the agency to consider.

Comment Number: BOEM-2024-0008-0611-0039
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

The NOI fails to acknowledge the restoration of the definition of cumulative impact in recent NEPA rule changes. The Biden Administration in the rulemaking of April 20, 2021 re- instituted the definition of cumulative effects in 1508.1(g)(3). That definition now states that cumulative impacts are "effects on the environment that result from the incremental effects of the action when added to the effects of other past, present, and reasonably foreseeable actions regardless of what agency (federal or non- federal) or person undertakes such other actions".

The definition clearly requires adding the effects of the proposed action to the effects of other reasonably foreseeable actions to get the cumulative impact result. But instead of simply doing that, the BOEM takes the reasonably foreseeable impact component, turns it into a new "baseline" and ascribes it to the no action alternative.

Comment Number: BOEM-2024-0008-0611-0004
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

At the outset, we would like to express our deep concern over the BOEM National Environmental Policy Act (NEPA) Review process that brought us to this point, because we believe that processes is an affront to the Act and to the public.

Since the beginning of its area and project selection process, the BOEM has made numerous decisions on what areas to accept or reject, and what projects to accept or reject that had significant environmental detriments and benefits. It accepted the decisions of a New Jersey led task force on what area to lease just off New Jersey and conversely what areas to reject. It accepted and rejected applicant proposals within that selected area. Subsequently it selected and rejected areas to lease in the New York Bight area father offshore from but still impacting New Jersey. It then accepted and rejected applicant proposals within those selected lease areas.

Comment Number: BOEM-2024-0008-0611-0042
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

The BOEM continues the misleading practice of including reasonably foreseeable federal state and other actions in the baseline of its no action alternative presentation. The impact of any single project, compared against that formidable array of projects and impacts will appear insignificant, which is apparently the BOEM purpose. This leads to the rather absurd conclusion that the impact of approving the project is less than that of not approving it.

The no action alternative should simply be the natural environment without any of those so that the cumulative impact of all can be assessed properly and compared to that. We hope that this EIS will dispense with that misleading presentation of the no action alternative.

Comment Number: BOEM-2024-0008-0611-0043
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

The structure and presentation of material in these EISs continues to be an insult to the Act and to the public. The NOI makes no mention of the page limits now embodied in the Inflation Reduction Act, or of any structural changes to the EIS. Prior EISs have been virtually incomprehensible to the lay reader for whom they should be designed. They have been much too long, filled with unnecessary technical detail, focused on insignificant versus significant issues, relied excessively on references, and filled with arbitrary scorings and conclusory statements, as opposed to providing actual quantitative impacts. We hope that the BOEM will take the new page restrictions seriously and produce a document that is useful to both a decision-maker and the general public.

Comment Number: BOEM-2024-0008-0611-0044
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

Contrary to NEPA's requirements, the BOEM has narrowly defined the purpose of the Atlantic Shores North Project so as to ensure that it could meet its goal to construct and operate a commercial-scale offshore wind energy facility in its lease area, thereby impermissibly limiting the available reasonable alternatives to the Project and predetermining the outcome of their review.

Comment Number: BOEM-2024-0008-0611-0045
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

We recommend that BOEM dispense with the scoring of impacts as to minor, major etc. But if it continues to do so then in the interest of NEPA full disclosure requirements, it must also disclose relevant environmental statutory and regulatory criteria, compare the impacts to them, and highlight any potential conflicts that this project creates with them.

Such criteria would include for example jeopardizing the continuing existence of a species relative to the ESA, impacting only small numbers and causing a non-negligible impact under the MMPA, and not adversely affecting historic properties under the NHPA and others. The failure to show these criteria presents to the public a misleading picture of what the nation has considered significant in its laws with respect to an environmental impact, versus what BOEM staff think is important.

Comment Number: BOEM-2024-0008-0611-0046
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

Per the CEQ NEPA rules An EIS should provide full and fair discussion of significant environmental impacts, 1502.1 and only brief discussion of other than significant issues 1502.2. It should be concise, clear and to the point and supported by evidence that the agency has made the necessary environmental analysis, 1502.1. It should not be encyclopedic and shall be analytic and concise, 1502.2. it should avoid useless bulk and concentrate effort and attention on important issues, 1502.15. Verbose descriptions of the affected environment are themselves no measure of the adequacy of an EIS, 1502.15. It should inform federal decision making and the public, 1502.1. To achieve those requirements 1502.7, and now the Inflation Reduction Act requires that the EIS:

"shall be 150 pages or fewer, and, for proposals of unusual scope or complexity, shall be 300 pages or fewer, unless a senior agency official of the lead agency approves in writing a statement to exceed 300 pages and establishes a new page limit".

This should be adhered to for this EIS.

Comment Number: BOEM-2024-0008-0611-0058
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

The BOEM should dispense with scoring the impacts of the proposed action and alternatives as negligible, minor, moderate or major, and characterizing impacts that way in comparative tables and throughout the entire DEIS. There are many reasons for ending this practice.

First, the NEPA regulations at 1502.14 call for a comparison of the "environmental impacts of the proposed action and the alternatives" in an EIS, not the agency's view of their severity or benefit, which is more appropriate for the Record of Decision.

Second, it discusses these scores extensively throughout the document in place of presenting actual numerical or qualitative environmental impacts.

Third, a "scored" comparison Table is of no use to readers who want to get an overview of the actual impacts and draw their own conclusions. It actually makes it harder for the reader to make comparisons because it requires the reader to go to many places in the lengthy draft or final EIS's, including Appendices, and then to many references to find actual impacts, which destroys the very purpose of the summary comparative table.

Fourth, it ignores statutory criteria as to what is significant or not. Having introduced criteria, it must also present the criteria in our laws such as those in the Endangered Species Act in the Marine Mammal Protection Act to give the reader the county's perspective as to what is significant, as opposed to that of the BOEM staff.

Finally, and most important, this practice of scoring is jeopardizing the objectivity of the EIS. Once a judgement has been made as to severity, the discussion then supports that score, and whether done consciously or not, data and discussion are being presented selectively to do that.

Comment Number: BOEM-2024-0008-0611-0059
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

Lack of Presentation of Significant Impacts

The affected environment and environmental consequences sections are dominated by discussion of the affected environment i.e., the thing being impacted as opposed to an actual impact itself. Numbers appear when describing technical equipment to be used but very few quantitative environmental impacts are provided. Graphs and visual portrayal of impacts are missing.

When impacts are presented, it is very often in the form of qualitative conclusory statements as to the severity or the lack thereof of an impact, again the focus on scoring discussed above. Some of these conclusions are not supported at all. Some are purportedly supported by references to other documents, but on reading those documents they often are not relevant to the proposal and do not support the conclusion. In many cases mitigating measures or caveats regarding what the actual proposal will include are not pinned down so the actual environmental impact is further obscured.

Comment Number: BOEM-2024-0008-0611-0009
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

The charge to the Task Force to limit its review to an area within 23 miles of shore, not above south Toms River and not below Atlantic City, was arbitrary and foreclosed the selection of reasonable and likely environmentally better alternative areas at the outset. There apparently was no notice to shore mayors that the area being identified was for placement of large numbers of wind turbines. The general public was not invited to Task Force meetings, and when some did show up, they were limited to observer status and unable to input to the process. In the middle of task force deliberations, a specific lease area was adopted by the BOEM without any apparent decision documentation, and appeared in the Federal Register. There was no final task force report as far as we can tell.

Comment Number: BOEM-2024-0008-0622-0002
Commenter Type: Individual
Commenter: Anne Muller

Comment Excerpt Text:

There is nothing about offshore wind that makes any sense. I will list briefly justification to that statement because I know this agency has heard and read this over and over again and to me, this agency is just holding hearings and comment periods with total disregard to what the people most affected by offshore wind have to say.

Comment Number: BOEM-2024-0008-0630-0001
Commenter Type: Individual
Commenter: Lindsay Osten

Comment Excerpt Text:

What concerns me the most is how BOEM did not even care to talk with the residents of Long Beach Island, who it will effect the most. The energy will not even be going to the island, but to other parts of NJ and NY. Perhaps if there was even a conversation we would be in a different place.

Comment Number: BOEM-2024-0008-0633-0010
Commenter Type: Federal Agency
Organization: Mid-Atlantic Fishery Management Council and New England Fishery Management Council

Comment Excerpt Text:

The National Environmental Policy Act (NEPA) requires consideration of a range of alternatives which could meet the defined purpose and need for the action. The EIS should clearly and succinctly define the purpose and need. The purpose and need should not be tied to broad federal renewable energy goals or the overall New Jersey state goal for renewable energy. This project has not yet entered into a contract for offshore renewable energy credits or another form of power purchase agreement. Therefore, the specific amount of energy production needed for the developer to meet contractual agreements is not yet known. In addition, as we have stated in previous comment letters for other wind projects, the implication that BOEM will not consider approving projects smaller than what is proposed by the developer or necessary to meet existing or expected contractual agreements made by the developer is very concerning as it limits

BOEM's ability to consider ways to reduce the potential negative impacts of the project, including "protecting biodiversity and ocean co-use." The EIS should indicate that BOEM's ability to approve a constructions and operations plan with modifications could mean approving a smaller project than that proposed by the developer or than would be necessary to meet agreements made by the developer. For example, state energy procurements are often made well before detailed site characterization data have been collected and before the impacts of the project have been fully analyzed. This can result in overly ambitious procurements which can pose challenges for reducing the negative impacts of the project.

Comment Number: BOEM-2024-0008-0633-0002
Commenter Type: Federal Agency
Organization: Mid-Atlantic Fishery Management Council and New England Fishery Management Council

Comment Excerpt Text:

- The EIS should not imply that BOEM will only approve projects that are large enough to meet existing or expected contractual agreements made by the developer as this limits BOEM's ability to reduce the negative impacts of the project.

Comment Number: BOEM-2024-0008-0647-0001
Commenter Type: Federal Agency
Organization: FWS

Comment Excerpt Text:

The U.S. Fish and Wildlife Service's New Jersey Field Office has reviewed the notice of intent to prepare an Environmental Impact Statement for a construction and operation plan of the Proposed Atlantic Shores North Project by the Bureau of Ocean Energy Management. Please see the attached letter for our review/comments. Let me know if you have any questions or concerns.

Comment Number: BOEM-2024-0008-0647-0002
Commenter Type: Federal Agency
Organization: FWS

Comment Excerpt Text:

The U.S. Fish and Wildlife Service's (Service) New Jersey Field Office has reviewed the notice of intent (NOI) to prepare an Environmental Impact Statement (EIS) for a construction and operation plan of the Proposed Atlantic Shores North Project by the Bureau of Ocean Energy Management (BOEM). The project is located within Lease Number Outer Continental Shelf (OCS) - A 0549, which is approximately 8.4 miles offshore of Long Beach Township, Ocean County, New Jersey and is proposed by Atlantic Shores Offshore Wind, LLC. The project proposes up to 157 wind turbine generators; up to 8 small, 4 medium, or 3 large offshore substations; up to one permanent meteorological tower; up to two temporary meteorological and metocean buoys; associated inter array cables; and export cables to transmit electricity from the offshore components to land. The landfall locations are proposed in Sea Girt, Monmouth County, New Jersey at the U.S. Army National Guard Training Center (identified as the Monmouth Landfall site) and possibly in New York City, New York or Asbury Park, New Jersey. Multiple onshore interconnection cable routes and substations are being considered, including to the Larrabee and Atlantic substations in Monmouth County, New Jersey; Fresh Kills and Goethals substations in Richmond County, New York; and Gowanus substation in Kings County, New York.

The NOI includes an invitation to interested Federal agencies to participate as cooperating agencies pursuant to the National Environmental Policy Act (83 Stat. 852, as amended; 42 U.S.C. 4321 et seq.) (NEPA) process. The Service chooses to and has previously expressed to BOEM that we will participate as a Cooperating Agency for the proposed project. The NOI also requests potential alternatives, information, and analyses relevant to the proposed action, including potential effects to biological and physical resources. The comments below provide a brief overview of the that information.

Comment Number: BOEM-2024-0008-0647-0003
Commenter Type: Federal Agency
Organization: FWS

Comment Excerpt Text:

The following comments are provided pursuant to NEPA. However, the Service has multiple authorities that it may make comments pursuant to in future EIS documentation. This includes the Fish and Wildlife Coordination Act (48 Stat. 401; 16 U.S.C. 661 et seq.); the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) (ESA); the Coastal Barrier Resources Act of 1982 (96 Stat. 1653 as amended; 16 U.S.C. 3501 et seq.) (CBRA); Executive Order (EO) 13186, Responsibilities of Federal Agencies to Protect Migratory Birds (January 10, 2001; 66 Federal Register (FR) 3853); the Migratory Bird Treaty Act of 1918 (40. Stat 755, as amended; 16 U.S.C. Section 703-712) (MBTA); the Clean Air Act, as amended (42 U.S.C. 7401 et seq.) (CAA); the Clean Water Act of 1977 (86 Stat. 816, 33 U.S.C. 1344 et seq.) (CWA); the Bald and Golden Eagle Protection Act (54 stat. 250, as amended, 16. U.S.C 668a-d) (BGEPA); the National Wildlife Refuge System Improvement Act of 1966, as amended by the National Wildlife Refuge System Improvement Act of 1997 (16 U.S.C. 668dd-33); and the Wilderness Act (78 Stat. 890; 16. U.S.C. 1131 et seq.).

The following comments do not preclude additional comments on forthcoming phases of the Project, including consultation on effects to federally listed species pursuant to Section 7(a)(2) of the ESA.

Comment Number: BOEM-2024-0008-0650-0001
Commenter Type: Individual
Commenter: Robert Coyne

Comment Excerpt Text:

The impact to the marine life and the communities along the shore has not been fully assessed. There has been no transparency in the unilateral decisions undertaken by the State and Federal Governments. Both the State and Federal Governments have not demonstrated how the benefits outweigh the concerns of the coastal communities. I stand opposed to all offshore wind in State and Federal Waters.

Comment Number: BOEM-2024-0008-0666-0001
Commenter Type: Local Government
Organization: New Bedford Port Authority

Comment Excerpt Text:

In identifying important relevant information that BOEM may consider as part of its environmental review of the Atlantic Shores North EIS, the NBPA continues to provide comments based on our unique perspective and experiences hosting the 1st in nation marshaling of a commercial-level offshore wind project (Vineyard Wind 1) as well as our status as the most profitable fishing port in the United States.

In undertaking mitigation measures for any WEA, it is vitally important that BOEM adhere to its

mitigation framework and undertake the four mitigation levels before financial compensation.

Recent EIS and COP documents appear to rely heavily on financial mitigation as the primary form of mitigating the impact of a WEA on commercial fishing. As previously noted by BOEM, per the Council of Environmental Quality (CEQ) regulations (40 CFR 1508.l(s)), mitigation includes:

1. Avoiding the impact altogether by not taking a certain action or parts of an action.

2. Minimizing impacts by limiting the degree or magnitude of the action and its implementation.

3. Rectifying the impact by repairing, rehabilitating, or restoring the affected environment.

4. Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.

5. Compensating for the impact by replacing or providing substitute resources or environments.

We ask that BOEM make every effort to undertake and ask the developers to fully demonstrate that they have made every possible effort to follow the above process. Financial compensation must be the last measure undertaken to mitigate through payments to fishermen for losses due to the WEA. At the least, the current stage is BOEM's opportunity to implement the first two parts of this process.

It is most probable that we will support the Habitat and Fisheries Impact Minimization Alternative after we review the conditions in the draft that would reduce impacts to habitat and fisheries and see that all provisions for mitigation mentioned above are met and in that order. We will also be attentive to the Uniform Grid Alternative related to commercial fishing in the WEA. We also would stress that the existence of financial mitigation should not be considered when evaluating the impact of a proposal or an alternative. Doing so only amounts to cutting corners in the mitigation framework mentioned above.

We continue to support the beneficial impacts expected from the project regarding federal and state energy goals, increasing job opportunities, improving air quality, and addressing climate change through new industries. Yet, we remain concerned that the commercial fishing industry and onshore support businesses are not given the proper attention as more and more projects are developing on the East Coast. There must be consideration of the cumulative impact of multiple projects moving forward.

We are confident that BOEM will analyze all significant impacts, as well as potential measures that would avoid, minimize, or mitigate identified non-beneficial impacts, and do so comprehensively based on past experiences with the many other projects being constructed or planned.

Comment Number: BOEM-2024-0008-0701-0001
Commenter Type: Individual
Commenter: Crystal Ankosko

Comment Excerpt Text:

There's not enough of intentional education on what these wind turbines will do in our area. Meetings to discuss with public were in cities 50 miles away from direct impact site. I'm not in support of the wind turbines. It's too close and not enough information has been shared with locals about impact. And why is the energy generated going to New York? Why are we not directly benefiting from this eye sore. I think this effort had been misleading and not enough information has been explicitly shared with the local public.

Comment Number: BOEM-2024-0008-0711-0003
Commenter Type: Individual
Commenter: allen magrini

Comment Excerpt Text:

I. Objection to Lack of Proper Public Hearings:

40 CFR 25.5-Public Hearings requires:

"Hearings must be held at times and places which, to the maximum extent feasible, facilitate attendance by the public. Accessibility of public transportation, and use of evening and weekend hearings, should be considered. In the case of actions with Statewide interest, holding more than one hearing should be considered. (Emphasis Added)

As detailed in the project materials provided, the project runs from Atlantic City on the south, north to Barnegat Light.

Project area runs the entire 18 mile shoreline of Long BrachIsland ("LBI")

To only hold live public hearings in:
-Asbury Park- 51 miles and 1hour drive north of LBI; and
-Two in New York State;
Staten Island - 80 miles and 1.5 hour drive north of LBI, Brooklyn - 94 miles and 1.5 hour drive north of LBI.

I submit it is not only unfair, but deprives the most impacted people/ communities a true and fair opportunity to participate, be heard and is in direct violation of the CFR Public Hearing Requirements.

No Live Hearing in Most Impacted Area

Formal Request filed for Additional Hearing:

On March 25 I sent a letter to Director Elizabeth Klein requesting an additional public hearing be held on LBI.

To date, No Response

Comments/Questions:

1. What is the BOEM reasoning for not holding a public hearing/forum on Long Beach Island, the community most impacted by the ASN Project?

2. On what basis did BOEM Director Elizabeth Klein ignore and not respond to my request for a hearing to be held on LBI?

3. While there were two virtual meetings, they were both held on workday evenings. Why didn't BOEM hold one of the virtual hearings on a weekend to provide a better opportunity for working people and people with families to participate?

Comment Number: BOEM-2024-0008-0711-0006
Commenter Type: Individual
Commenter: allen magrini

Comment Excerpt Text:

V. Improperly Withheld Public Documents:

There is an excessive number of alleged "Confidential Documents" that are being withheld from public

view. Without these documents a complete public review is not possible. Therefore this matter should dismissed and rescheduled for review when all document are made available.

The following lists and identifies the alleged "Confidential " documents.

- Appendix I-G: Submarine Export and Onshore Interconnection Cable Route Determination Summary for Lease Area OCS- A 0549 (Redacted)
- Appendix II-A: Geology, Hazard, and G&G Reports
- Appendix II-A1: Geophysical and Geohazard Report (Confidential)
- Appendix II-A2: Geophysical Survey Factual Reports (Confidential)
- Appendix II-A3: Geotechnical Survey Factual Reports (Confidential)
- Appendix II II-A4: Munitions and Explosives of Concern (MEC Reports) (Confidential)
- Appendix II II-A5: Cable Burial Risk Assessment (CBRA) Reports (Confidential)
- Appendix II II-A6: Geoscience-focused Desktop Study Report for the Wind Turbine Area (Confidential)
- Appendix II-B: Metocean Reports
- Appendix II-B1: Metocean Analysis Report (Confidential)
- Appendix II-B2: Metocean Design Basis (Redacted for Confidential Information)

Appendix II-F: Avian and Bat Reports
- Appendix II-F1: Avian and Bat Survey Plan (Confidential)

Questions/Comments:

1. No factual basis, or any basis at all, is provided to support the withholding of the above identified "confidential documents" . A proper basis and and support must be provided for each of the documents before any of the can be properly be deemed confidential.
2. In determining where to hold public meetings BOEM determined that where cables etc. enter upon the land a public hearing should be held in those locations due to the critical nature of the land connection. (Asbury Park, Staten Island and Brooklyn) It is then required that BOEM provide the documents/information, such as by way of example, the Cable Burial Risk Assessment (CBRA) Reports, for public review and not just withhold the documents from the public without any explanation. Further more without these documents it is not possible to hold a true and meaningful public hearing.

Comment Number: BOEM-2024-0008-0761-0014
Commenter Type: Individual
Commenter: John Deputato

Comment Excerpt Text:

Are you prepared for class action lawsuits because I assure you the citizens of LBI will not standby and have our way of life destroyed without a fight.

Comment Number: BOEM-2024-0008-0761-0015
Commenter Type: Individual
Commenter: John Deputato

Comment Excerpt Text:

Many wonder why you did not schedule a public meeting anywhere near LBI? The closest was in Asbury Park which is over 50 miles away?

Was this being a good Steward? Is this being transparent?

Comment Number: BOEM-2024-0008-0772-0001
Commenter Type: Individual
Commenter: Jay Hutchinson

Comment Excerpt Text:

As a supporter of wind energy, I have been carefully following the wind-turbine program off the coast of New Jersey, specifically Long Beach Island. It has been my understanding that the location of the in-ocean wind farm would be much farther off shore than 8 miles. Further, the amount of added infrastructure that has been included in the project's explanation is troublesome to me. My understanding was that these turbines would be almost unseen on most, if not all days, and that the support structures on land would be limited. This proposal is clearly not what has been explained to Long Beach Island residents and homeowners in the past. I feel that this entire project has been vastly misrepresented and needs both revision and oversight.

Comment Number: BOEM-2024-0008-0803-0001
Commenter Type: Individual
Commenter: Salvador Del Mar

Comment Excerpt Text:

Simply put, the people who live and work on the coast of New Jersey do not want this project nor any other of these boondoggles to happen.

This project and all others approved by the State of New Jersey violates the Fifth and Fourteenth Amendments to the United States Constitution is regards to "Due Process" of the Citizen and true stakeholders.

Governor Murphy signed S3926 into law in 2021.
This authorizes certain offshore wind projects to construct power lines and obtain real property interests; grants BPU authority to supersede certain local governmental powers upon petition from offshore wind project.

This bill violates the New Jersey constitutional amendments in 1875 and 1917 which prohibits special legislation concerning municipalities. The bill signed by Murphy removes municipalities "Home Rule" and grants it to an unelected body. A law that specifically targets a specific municipalities and a specific commercial sector is special legislation.

As these projects have emerged from general policies they are now real projects with tangible locations and tangible harm to individuals life, liberty, and property. This comment period is just that comments. It is not a valid redress of individuals' due process being denied because BOEM is not an elected governing body. As a federal agency you must respect the law and that would be to cancel this project until individuals have their due process restored and a valid consensus on this project and others can be addressed.

Comment Number: BOEM-2024-0008-0852-0002
Commenter Type: Individual
Commenter: Sylvia Lockwood

Comment Excerpt Text:

In addition, under Volume II, Affected Environment, of the Construction and Operation Plan, the following appendices are either confidential or redacted as noted: Several Marine Site Investigation Reports, Cable Corridors and NY/NJ Landfall Approaches, Several Factual Geophysical Reports, Measured and Derived Geotechnical Parameters, Soil Boring Locations/Deep CPTs, Measured and Derived Geotechnical Parameters, Cable Burial Risk Assessment, Munitions and Explosives of Concern (MEC) Hazard Assessments, Metocean Analysis Report & Design Basis, Avian and Bat Survey Plan, Avoidance, Minimization, and Mitigation (AMM) Plan, Terrestrial Archaeological Resources Assessment, Onshore Interconnection Facilities (Redacted), Marine Archaeological Resource Assessment (MARA) NY and NJ (Redacted). Please note the specific volumes numbers have been omitted and/or abbreviated due to lack of space permitted. These are absolutely critical environmental areas and to have this abundance of information be redacted/confidential fails to allow the public to view this material as it is required under the Freedom of Information Act. This lack of information also prohibits meaningful research in order to provide relevant public comments which are required to be included as part of the process of development. Although not included in my detailed research to date, I also have concerns regarding additional environmentally sensitive areas, specifically the wetlands, benthic habitat, and cold pool, plus economic and national security issues among others

Comment Number: BOEM-2024-0008-0922-0009
Commenter Type: Individual
Commenter: John Maxwell

Comment Excerpt Text:

Remember-first do no harm! I do not see how you can honestly say that this project. which was ram-rodded without public vote via Governor Murphy's executive orders will positively affect our environment.

Comment Number: BOEM-2024-0008-0928-0001
Commenter Type: State Government
Organization: NJDEP

Comment Excerpt Text:

The New Jersey Department of Environmental Protection (NJDEP) appreciates the opportunity to provide comments on the Notice of Intent to Prepare an Environmental Impact Statement for the Proposed Atlantic Shores North Project submitted by Atlantic Shores Offshore Wind, LLC (ASOW). The project is to be located on the U.S. Outer Continental Shelf Offshore New Jersey in Renewable Energy Lease Area OCS- A 0549.

Under the leadership of Governor Phil Murphy, New Jersey's development of offshore wind energy, together with other clean and renewable energy sources, is critical to addressing the challenges associated with climate change and to building a clean energy economy. As a state with one of the most ambitious offshore wind goals in the nation, we are on the path to achieving 11,000 MW of offshore wind power by 2040, and 100% clean energy by 2035. As the State pursues the responsible development of offshore wind, the NJDEP is obligated, pursuant to the federal Coastal Zone Management Act, 16 U.S.C. 1451, et seq., and related state laws, to preserve, protect, restore, and enhance the resources of the State's coastal

zone.

Comment Number: BOEM-2024-0008-0928-0002
Commenter Type: State Government
Organization: NJDEP

Comment Excerpt Text:

As a cooperating agency, NJDEP looks forward to continued coordination with BOEM, to ensure that impacts to natural resources are avoided, minimized where avoidance is not possible, and appropriately mitigated for when necessary. Upon review of the Notice of Intent to Prepare an Environmental Impact Statement for the proposed Atlantic Shores North Project, NJDEP offers the following comments:

Comment Number: BOEM-2024-0008-0928-0004
Commenter Type: State Government
Organization: NJDEP

Comment Excerpt Text:

Thank you for providing the New Jersey Department of Environmental Protection with the opportunity to comment on the Notice of Intent to Prepare an Environmental Impact Statement for the Atlantic Shores North project. We look forward to continuing to work with BOEM throughout the environmental review process, as well as with ASOW throughout the state's regulatory process.

Comment Number: BOEM-2024-0008-0930-0001
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

This is being done way too quickly for political purposes without realization of negative impacts that are slowly coming to fruition as necessary research continues please stop this fast moving train rather than having to be reactive later with corrective measures

Comment Number: BOEM-2024-0008-0951-0002
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

During multiple stages of this project the public has been fed inaccurate and changing details as to location and scope of the project. We have been lied to as to the visibility of the turbines and now we hear the electricity will benefit another state while increasing electric costs for those in NJ.

Comment Number: BOEM-2024-0008-0962-0001
Commenter Type: Individual
Commenter: Barbara Sommer

Comment Excerpt Text:

Before recklessly proceeding with this development, it is crucial to carefully consider these concerns and

the concerns of all NJ residents. These concerns seem to have been quickly brushed aside in favor of pushing through Executive Orders to override any public resistance.

Comment Number: BOEM-2024-0008-0969-0001
Commenter Type: Local Government
Organization: Long Beach Township, NJ

Comment Excerpt Text:

The Township requests that BOEM provide a 120-day comment period to allow sufficient review of the draft Environmental Impact Statement (DEIS). During previous comment periods for offshore wind projects in similar areas, dozens of public comments requested that BOEM extend its public comment period, echoing Long Beach Township's request for an extension. BOEM's standard 30-day review period is inadequate for a document of such size and complexity. The DEIS for the Atlantic Shores South project spanned over 4,000 pages, whereas Section 1502.7 of the NEPA rules specifies that an EIS should be limited to 150 pages, except for exceptionally large or complex proposals where a limit of 300 pages applies. The Council on Environmental Quality has established NEPA rules which require a "full and fair discussion of significant environmental impacts" and only brief discussion of other important matters. The Township requests that the document adhere to CEQ NEPA guidelines to produce a document in a readable format that is digestible by laypeople within a reasonable timeframe.

Comment Number: BOEM-2024-0008-0969-0002
Commenter Type: Local Government
Organization: Long Beach Township, NJ

Comment Excerpt Text:

Furthermore, in previous EIS's BOEM spent a substantial amount of time and effort focusing on highlighting potential project benefits, without adequate discussion of the significant environmental impacts that EIS's are intended to focus on. This is inappropriate for an EIS and should not be included in the Atlantic Shores North DEIS.

Comment Number: BOEM-2024-0008-0969-0003
Commenter Type: Local Government
Organization: Long Beach Township, NJ

Comment Excerpt Text:

As BOEM moves forward in this process, it is of paramount importance that the agency consider the cumulative impacts to several areas of concern. Previously, the DEIS for Atlantic Shores South was deficient in that it failed to examine the cumulative environmental impacts as required by Federal regulations. In fact, federal regulations require that NEPA analyses must assess cumulative effects,[Footnote 1: 32 CFR 651.16] and determine the environmental consequences of the action. The analysis should identify the cause-and-effect relationships, determine the magnitude and significance of cumulative effects, and identify possible mitigation measures. This project is just 1 of 48 or more proposed wind farms along the Eastern Seaboard, which collectively introduce various cumulative impacts which must be understood prior to construction. Furthermore, a failure to do so is a flagrant violation of federal regulation and moreover, a clear abdication of BOEM's commitment to managing the development of U.S. Outer Continental Shelf (OCS) energy, mineral, and geological resources in an environmentally and economically responsible way.[Footnote 2: The Bureau of Ocean Energy Management (BOEM)] BOEM and NOAA's own scientists are aware of the environmental perils of

offshore wind projects, yet BOEM continues its cavalier approach in advancing the boundless industrialization of the ocean. BOEM has failed in its mission to manage the development of offshore wind projects in an environmentally and economically sound manner consistent with the requirements under NEPA regulations by failing to quantify cumulative impacts.[Footnote 3: 932 CFR 651.16 In addition, Federal courts have recognized the importance of including cumulative impacts under NEPA. For example, see Kleppe v. Sierra Club, 427 U.S. 390, 413 (1976)] Once constructed, thousands of acres of offshore wind farms will undoubtedly have impacts on the marine environment as well as atmospheric impacts from wind wakes produced by wind turbines, which produce a net-warming effect.[Footnote 4: Akhtar, N., Geyer, B. & Schrum, C. Impacts of accelerating deployment of offshore windfarms on near-surface climate. Sci Rep 12, 18307 (2022). https://doi.org/10.1038/s41598-022-22868-9.

Comment Number: BOEM-2024-0008-0970-0001
Commenter Type: Individual
Commenter: denise boccia

Comment Excerpt Text:

April 3, 2024, BOEM held a Virtual Meeting regarding Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) for the Atlantic Shores O?shore Wind North project (ASOW North) o?shore New Jersey, lease number OCS-A-0549.
During the virtual Q&A section several people asked why BOEM did not schedule an in-person meeting in Sea Girt or Long Beach Island, New Jersey where turbines are being proposed 8.2 miles o?shore, making this development the closest, largest, most industrial OSW project in the world.
The recorded virtual meeting responses from the BOEM (Kimberly Sullivan) on two similar questions regarding in person meeting locations. The first response was a verbatim read o? the Federal Register and the second response seems to contradict the first response which noted the proposal of TWO landfalls, not FOUR possible locations.

Comment Number: BOEM-2024-0008-0970-0011
Commenter Type: Individual
Commenter: denise boccia

Comment Excerpt Text:

For the record, Atlantic Shores OCS-A-0549 proposes to construct up to 157 wind turbine generators 8.2 miles from the coast o? of Long Beach Island, NJ and 60 miles from New York City and yet the BOEM has not held a single in person meeting on Long Beach Island, NJ where residents, fishermen and tourists are most adversely a?ected by such development. Also, Atlantic Shores OCS-A-0499 proposes to construct up to 200 wind turbine generators 8.4 miles o? of Long Beach Island, NJ - a total of 357 turbines which will industrialize the pristine beaches o? the coast of New Jersey.

Comment Number: BOEM-2024-0008-0970-0002
Commenter Type: Individual
Commenter: denise boccia

Comment Excerpt Text:

According to the Federal Code of Regulations, hearings must be held at times and places which, to the maximum extent feasible, facilitate attendance by the public. Accessibility of public transportation, and use of evening and weekend hearings, should be considered. In the case of actions with Statewide interest, holding more than one hearing should be considered.

Comment Number: BOEM-2024-0008-0970-0005
Commenter Type: Individual
Commenter: denise boccia

Comment Excerpt Text:

Public Concern:

If the Northern ECC may split landfall, either Asbury Park or Fresh Kills, then holding an in person meeting on April 9th in Asbury Park, NJ would actually be part of a New York Statewide interest. And why would BOEM hold an in person meeting at the Dyker Golf Club, Brooklyn, New York on April 11th when NO LANDFALL is proposed at this location for this Notice of Intent?
So regarding the case of Statewide interest for an in person meeting, shouldn't an in person meeting be held for the Monmouth ECC in New Jersey where landfall in proposed in Sea Girt, NJ. This landfall site has been publicly announced by the Governor, which is part of the 168-acre National Guard Training Center, located in the coastal community of Sea Girt, in Monmouth County.

Comment Number: BOEM-2024-0008-0970-0006
Commenter Type: Individual
Commenter: denise boccia

Comment Excerpt Text:

In speaking with Lisa Landers at the 4/10 meeting on Staten Island, she told me "BOEM did look at Sea Girt, but were unable to find a venue" - please advise which venues were contacted in Sea Girt, NJ.

Comment Number: BOEM-2024-0008-0970-0007
Commenter Type: Individual
Commenter: denise boccia

Comment Excerpt Text:

The BOEM's decision not to facilitate an in person meeting in the Monmouth ECC leaves the State of New Jersey without the ability for an in person meeting for this proposed action notice of intent; export cable corridor landfalls for Atlantic Shores 0549.

Comment Number: BOEM-2024-0008-0970-0009
Commenter Type: Individual
Commenter: denise boccia

Comment Excerpt Text:

When visiting the Staten Island in person meeting on 4/10, the venue had more security guards hired than attendees for public comment. BOEM did not understand the demographics of this area and should have consulted other sources to accommodate the public when coordinating an in person meeting. Going forward with in person meetings for ASOW, I would request BOEM contact venues within 18 miles of Long Beach Island, NJ; perhaps allow the public to recommend a few venues for consideration.

Comment Number: BOEM-2024-0008-0989-0005
Commenter Type: Business/Trade Association
Organization: Vacation Rentals Jersey Shore LLC

Comment Excerpt Text:

I strongly suggest you review the two studies I mentioned above. I also offer to you my support and cooperation for conducting a similar study using the latest simulations BOEM has for AS2. We can survey up to 100,000 actual families who rent at the Jersey Shore each year and get their feedback.

Comment Number: BOEM-2024-0008-1004-0001
Commenter Type: Individual
Commenter: Michael Dean

Comment Excerpt Text:

BOEM's Intent To Prepare an Environmental Impact Statement (EIS) for the Proposed Atlantic Shores North Project on the U.S. Outer Continental Shelf Offshore New Jersey must be withdrawn until appropriate analysis is conducted and evaluated.

Comment Number: BOEM-2024-0008-1007-0001
Commenter Type: State Government
Organization: New York State

Comment Excerpt Text:

See attached file(s)

Attachment:

Kimberly Sullivan

NEPA Coordinator, Environmental Branch for Renewable Energy

Bureau of Ocean Energy Management

45600 Woodland Road, VAMOREP

Sterling, Virginia 20166

Electronic Submission: 05-02-2024

RE: BOEM-2024-0008

Notice of Intent to Prepare an Environmental Impact Statement (EIS) for the Proposed Atlantic Shores Offshore Wind North Project in in Renewable Energy Lease Area OCSA 0549.

Comment Number: BOEM-2024-0008-1007-0010
Commenter Type: State Government
Organization: New York State

Comment Excerpt Text:

a. Utilize data and analysis in the NYSERDA Cables Assessment and the NYS Public Service Commission "Order Addressing Public Policy Requirements For Transmission Planning Purposes":{{Footnote 5: Source: https://www.nyiso.com/documents/20142/1406395/PSC-Order-NYC-PPTN.pdf}}

i. The NYSERDA Cables Assessment identifies constraints, avoidance areas, as well as an inventory of minimization and mitigation measures applied to authorized projects in NYS waters. The study also includes siting principles that support installation of multiple cables, while minimizing use of space and impacts on environmental, cultural, and social resources.

ii. The PSC Order NYC PPTN{{Footnote 6: Ibid}} includes supplemental criteria for cable siting that describe principles to optimize routing of multiple offshore wind cables in the marine environment, and principles to optimize routing of multiple offshore wind cables at landfalls and overland.

Comment Number: BOEM-2024-0008-1007-0002
Commenter Type: State Government
Organization: New York State

Comment Excerpt Text:

New York State Comments

Dear Kimberly Sullivan,

The New York State Departments of State (NYSDOS), Environmental Conservation (NYSDEC), Public Service (NYSDPS), and the Office of Parks, Recreation and Historic Preservation (OPRHP), in consultation with the New York State Energy Research & Development Authority (NYSERDA), the New York State Department of Transportation (NYSDOT), and the Office of General Services (NYSOGS), (collectively "the Agencies"), jointly submit the enclosed comments in response to the Bureau of Ocean Energy Management's (BOEM) Notice of Intent{{Footnote 1: 89 FR 19350. Notice of Intent To Prepare an Environmental Impact Statement for the Proposed Atlantic Shores North Project on the U.S. Outer Continental Shelf Offshore New Jersey}} to prepare an Environmental Impact Statement (EIS), pursuant to the National Environmental Policy Act (NEPA) for a Construction and Operations Plan (COP) submitted by Atlantic Shores Offshore Wind, LLC (Atlantic Shores).

Comment Number: BOEM-2024-0008-1007-0021
Commenter Type: State Government
Organization: New York State

Comment Excerpt Text:

7. Ongoing Coordination: The Agencies note that, notwithstanding BOEM's obligation to analyze environmental impacts for proposed and future projects within the NY Bight, including State waters and relevant upland transmission components, the State has a parallel process pursuant to Article VII{{Footnote 11: The Agencies note that Article VII of the Public Service Law will in the future be replaced by a new permitting process for major electric transmission lines and facilities pursuant to legislation recently signed into NYS law (Part O of Chapter 58 of the Laws of 2024). The program is to be administered by the Office of Renewable Energy Siting (ORES) within the NYS Department of Public Service (NYS DPS).}} of New York State Public Service Law 120 et. seq. that analyzes the need for and environmental impacts of transmission components within the State's jurisdictional boundary. By participating in BOEM's NEPA review and as parties to relevant Article VII proceedings, NYSDOS, NYSDEC, and NYSDPS are committed to facilitating continued coordination between the State and federal review processes.

Comment Number: BOEM-2024-0008-1007-0022
Commenter Type: State Government
Organization: New York State

Comment Excerpt Text:

8. Community Engagement: The Agencies encourage developer-led early and frequent engagement with communities. Notably, the COP identifies population and economic statistics for potentially affected NYS counties (Volume II Section 7) and discusses potential impacts to environmental justice areas and disadvantaged communities (Volume II Section 7.2). Community involvement Throughout construction, operation, and decommissioning is essential for co-existence with existing maritime industries to be realized, particularly in environmental justice areas and disadvantaged communities. Active involvement and engagement with tribal nations, as well as fishing industries, mariners, and coastal communities, as this will promote inclusion so that their perspectives, concerns, and input are well-integrated and inform this Project.

Comment Number: BOEM-2024-0008-1007-0024
Commenter Type: State Government
Organization: New York State

Comment Excerpt Text:

The Agencies appreciate the opportunity to provide this input as BOEM embarks on its environmental review of the Proposed Project. Please contact Karen Gaidasz, Bureau of Energy Project Management Director at NYSDEC (518-402-9153; karen.gaidasz@dec.ny.gov), Jason Zehr, Chief, Environmental Certification and Compliance at NYSDPS (518-486-2464; jason.zehr@dps.ny.gov), Michael Snyder, Ocean and Great Lakes Division Director at NYSDOS (716-847-7103; michael.snyder@dos.ny.gov), or Shari Calnero, Associate Counsel at OPRHP (518-402-5685; shari.calnero@parks.ny.gov) for further detail on the enclosed scoping comments and future opportunities to provide comment.

Respectfully Submitted,

Kisha Santiago

Deputy Secretary of State

Office of Planning, Development and Community Infrastructure Department of State

Jessica Waldorf

Chief of Staff and Director of Policy Implementation

Department of Public Service

Thomas Alworth

Executive Deputy Commissioner

Office of Parks, Recreation and Historic Preservation

Sean Mahar

Interim Commissioner

Department of Environmental Conservation

Comment Number: BOEM-2024-0008-1007-0004
Commenter Type: State Government
Organization: New York State

Comment Excerpt Text:

The Atlantic Shores COP identifies a range of potential impacts to New York's coastal resources and uses that the Agencies recommend be addressed in the EIS analysis. In addition, the Agencies request a specific focus on the development of alternatives and proposed mitigation related to the identified Northern Export Cable Corridor in New York State jurisdictional waters, as well as potential landfall sites and points of interconnection within New York State.

Comment Number: BOEM-2024-0008-1007-0005
Commenter Type: State Government
Organization: New York State

Comment Excerpt Text:

NYSDOS and NYSDEC are pleased to participate in BOEM's NEPA review as cooperating agencies and welcome the opportunity to continue to engage in this important, collaborative process on behalf of New York State. To support BOEM's NEPA scoping and environmental review of the Atlantic Shores North Project, the Agencies respectfully submit the following detailed comments:

Comment Number: BOEM-2024-0008-1007-0007
Commenter Type: State Government
Organization: New York State

Comment Excerpt Text:

2.Considerations for BOEM's EIS Timeline:

a. The Agencies seek to inform BOEM on considerations for the EIS timeline for this project. New York has taken steps to develop offshore transmission infrastructure capable of collecting energy generated at multiple offshore platforms and delivering it to onshore interconnection points in New York City. The New York State Public Service Commission (the Commission), by Order issued June 22, 2023, initiated a competitive process for the submission of proposals to build at least 4,700 MW, and up to 8,000 MW of transmission capacity to serve the State's 9,000 MW target (New York City Public Policy Transmission Need; PPTN).{{Footnote 3: Case 20-E-0197}} The solicitation is expected to result in selection of a transmission proposal in late 2025. Should Atlantic Shores elect to participate in a New York contract solicitation, it may be required to connect with this planned transmission infrastructure. Thus, the State will effectively mandate use of the NYC PPTN project as part of future OREC solicitations for projects proposing interconnection into New York City. This may have an effect on the development of the Project's potential Northern Export Cable Corridor.

Comment Number: BOEM-2024-0008-1010-0002
Commenter Type: Local Government
Organization: Cape May County, NJ

Comment Excerpt Text:

Since the inception of offshore wind projects in the mid-Atlantic region, Cape May County has prioritized avoiding adverse impacts on its communities. Despite quantified environmental, economic, and social

impacts on Cape May County and broader New Jersey, BOEM is proceeding with offshore wind project approvals to meet the Administration's 2030 goal of 30 GW of offshore wind capacity. The County has provided exhaustive comments, held meetings with developers, and worked with elected officials to address visibility and location issues of proposed wind turbines, but these attempts have been disregarded by BOEM. Given BOEM's failure in adequately reviewing and analyzing offshore wind Construction and Operations Plans, especially cumulative effects, these comments will explicitly outline the areas where BOEM should concentrate its attention during the drafting of the Environmental Impact Statement.

Comment Number: BOEM-2024-0008-1010-0003
Commenter Type: Local Government
Organization: Cape May County, NJ

Comment Excerpt Text:

The County requests that BOEM provide a 120-day comment period to allow sufficient review of the draft Environmental Impact Statement (DEIS). During previous comment periods for offshore wind projects in similar areas, dozens of public comments requested that BOEM extend its public comment period, echoing Cape May County's request for an extension. BOEM's standard 30-
day review period is inadequate for a document of such size and complexity. The DEIS for the Atlantic Sh ores South project spanned over 4,000 pages, whereas Section 1502.7 of the NEPA rules specifies that an EIS should be limited to 150 pages, except for exceptionally large or complex proposals where a limit of 300 pages applies. The Council on Environmental Quality has established NEPA rules which require a "full and fair discussion of significant
environmental impacts" and only brief discussion of other important matters. The County requests that the document adhere to CEQ NEPA guidelines to produce a document in a readable format that is digestible by laypeople within a reasonable timeframe.

Furthermore, in previous EIS's BOEM spent a substantial amount of time and effort focusing on highlighting potential project benefits, without adequate discussion of the significant environmental impacts that EIS's are intended to focus on. This is inappropriate for an EIS and should not be included in the Atlantic Shores North DEIS.

Comment Number: BOEM-2024-0008-1010-0007
Commenter Type: Local Government
Organization: Cape May County, NJ

Comment Excerpt Text:

One clear example is BOEM's response to Cape May County's Ocean Wind 1 comments about negative impacts to commercial fishing. BOEM responded by insisting the wind energy area pertaining to Ocean Wind 1 is just a small part of the available fishing grounds while blatantly ignoring that the agency obviously plans to approve dozens more offshore wind farms covering millions of acres in the North Atlantic. Simply acknowledging cumulative impacts while not addressing them is a violation of NEPA requirements on cumulative impacts and is a disservice to the taxpayer and the local elected officials, residents, and businesses that will be negatively impacted by offshore wind projects.

Comment Number: BOEM-2024-0008-1010-0008
Commenter Type: Local Government
Organization: Cape May County, NJ

Comment Excerpt Text:

NEPA guidelines on cumulative impacts require the agency to consider cumulative impacts if the proposed action "is one of several similar actions in the same geographic area."10 One of the sole purposes of addressing cumulative impacts is to prevent the piecemeal construction of smaller projects which, once constructed, amount to one larger project. However, this is exactly what BOEM is doing by allowing the construction of dozens of discrete offshore wind projects, which form one interconnected industrial power plant once constructed. This exact issue was raised in the Ocean Wind 1 DEIS and was neither acknowledged nor responded to in the Ocean Wind 1 FEIS. In order to resolve this deficiency, BOEM must reverse course and prepare a Programmatic Environmental Impact Statement (PEIS) for the entire New Jersey and New York Bight area.

Comment Number: BOEM-2024-0008-1028-0017
Commenter Type: Advocacy Group
Organization: BlueGreen Alliance

Comment Excerpt Text:

BOEM should detail information related to air and water quality impacts associated with potential manufacturing, port activities, construction, and ongoing operations and maintenance. It should also include analysis of the benefits of community consultation related to adverse impacts and methods for continued community engagement around the oversight, monitoring, and structuring of mitigation plans including adaptive management strategies.

Comment Number: BOEM-2024-0008-1029-0001
Commenter Type: Individual
Commenter: Douglas Crawford

Comment Excerpt Text:

BOEM appears to ignore most of the significant impacts raised in their own EIS documents, as well as the concerns raised by the well-researched public. The approvals of the projects to date seem to only ensure that the projects move forward with the appearance of having been fully vetted, and the mainstream press bolsters that perception to the public. A critical viewpoint is now widespread, and if successful, will lead to new and increased pressures to prevent offshore wind projects from proceeding in New Jersey, on the East Coast, and around the coastal areas of the USA.

Comment Number: BOEM-2024-0008-1040-0014
Commenter Type: Individual
Commenter: Denise Boccia

Comment Excerpt Text:

The EIS for Atlantic Shores contains some minor modifications of the project that are called alternatives. They are really not, because they don't change the environmental impact of the project and that's what you need to do to create a real alternative. Why are there no real options left in this EIS to consider?

Comment Number: BOEM-2024-0008-1040-0002
Commenter Type: Individual
Commenter: Denise Boccia

Comment Excerpt Text:

AS North will be by far the closest to shore large project in the US and using very large gear box turbines. How will BOEM assure the public that the operational turbine noise will not be intrusive to beach goers and to fishermen?

Comment Number: BOEM-2024-0008-1040-0020
Commenter Type: Individual
Commenter: Denise Boccia

Comment Excerpt Text:

Why does the NJ DEP stakeholder coordination list only include pro-wind energy groups?

Comment Number: BOEM-2024-0008-1040-0006
Commenter Type: Individual
Commenter: Denise Boccia

Comment Excerpt Text:

Why has the BOEM just strengthened the decommissioning rules for oil and gas platforms but not for offshore wind?

Comment Number: BOEM-2024-0008-1040-0007
Commenter Type: Individual
Commenter: Denise Boccia

Comment Excerpt Text:

Are the concerns raised that these public meetings brought to the attention of higher BOEM management? If so, how is that done?

Comment Number: BOEM-2024-0008-1040-0008
Commenter Type: Individual
Commenter: Denise Boccia

Comment Excerpt Text:

Who within BOEM makes the decisions as to how the EIS is structured, and what information should or should not be in it?

Comment Number: BOEM-2024-0008-1040-0009
Commenter Type: Individual
Commenter: Denise Boccia

Comment Excerpt Text:

We noticed that the BOEMs scoring system in the EIS has no category for an unacceptable impact. What

environmental impact then would cause the BOEM to disapprove a project?

Comment Number: BOEM-2024-0008-1043-0013
Commenter Type: Local Government
Organization: Borough of Sea Girt, NJ Planning Board

Comment Excerpt Text:

A concern that for such a substantial and environmentally
sensitive project, the public comment period is just too short, too immediate, and generally inconsistent with good government practice

---

Comment Number: BOEM-2024-0008-1043-0014
Commenter Type: Local Government
Organization: Borough of Sea Girt, NJ Planning Board

Comment Excerpt Text:

Please advise if the Sea Girt Planning Board and / or the Borough of Sea Girt will have any future opportunities to publicly comment/ object to the subject proposal.

Comment Number: BOEM-2024-0008-1043-0015
Commenter Type: Local Government
Organization: Borough of Sea Girt, NJ Planning Board

Comment Excerpt Text:

I would also ask that you please advise as to what other ways the Planning Board Objections can be further clarified/ memorialized.

Comment Number: BOEM-2024-0008-1069-0001
Commenter Type: Advocacy Group
Organization: Clean Ocean Action

Comment Excerpt Text:

Clean Ocean Action ("COA") is a regional coalition of conservation, environmental, fishing, boating, diving, student, surfing, women's, business, civic, and community groups with a mission to improve the water quality of the marine waters off the New Jersey/New York coast. COA has been actively following offshore wind development in the New York/New Jersey Bight for almost two decades. Over the past several years, COA has engaged with the Bureau of Ocean Energy Management ("BOEM") and other state and federal agencies regarding offshore wind development, including the various Atlantic Shores projects. [Footnote 1: E.g. Clean Ocean Action, Comments re Atlantic Shores South Federal Consistency Determination for Review Lease Area OCS-A 0499 (Oct. 19, 2023); Clean Ocean Action, Comments re Draft Environmental Impact Statement for Atlantic Shores South Offshore Wind Projects (July 3, 2023); Clean Ocean Action, Comments re Takes of Marine Mammals Incidental to Specified Activities; Taking Marine Mammals Incidental to Marine Site Characterization Surveys Off New York, New Jersey, Delaware, and Maryland (Feb. 5, 2024).] Rather than restate those comments, we incorporate them by reference. COA submits the following comments in response to the Notice of Intent to Prepare an Environmental Impact Statement ("EIS") for the Proposed Atlantic Shores North

project.

Comment Number: BOEM-2024-0008-1069-0002
Commenter Type: Advocacy Group
Organization: Clean Ocean Action

Comment Excerpt Text:

COA staff attended the in-person public meeting on the Notice of Intent in Brooklyn, New York, and noticed that while the posters presented at the in-person meetings were linked in advance of the event, the department and professional backgrounds of the representatives were not. It would be helpful for members of the public to know the department and professional background of the representatives that will be attending in advance. This would aid members of the public in tailoring their questions ahead of public meetings. The posters give an idea of the topics that will be covered as well, but they are often about a specific issue within an impact-producing factor, so information about the presenters themselves would be an even more valuable addition. For example, if a member of the public knew there would be both a marine mammal specialist and an acoustician represented, they could prepare more specific and thoroughly researched questions on those topics. COA appreciates the opportunity to give feedback on the structure of in-person and virtual meetings and recognizes that the process has improved.

Comment Number: BOEM-2024-0008-1069-0022
Commenter Type: Advocacy Group
Organization: Clean Ocean Action

Comment Excerpt Text:

Although the substations' discharge will be regulated by the National Pollutant Discharge Elimination System, BOEM must factor the effect of discharging heated water with added biocides into the EIS analysis, in order to capture all sources of impact.

Comment Number: BOEM-2024-0008-1069-0003
Commenter Type: Advocacy Group
Organization: Clean Ocean Action

Comment Excerpt Text:

A common element to all of BOEM's offshore wind project proposals and documents with which COA has been involved is the idea that the agency will adapt its procedures in response to the effects of the offshore wind projects. Essentially, BOEM expects to learn more about probable impacts and effective mitigation techniques as the industry develops. For example, according to BOEM representatives at the in-person stakeholder meeting in Brooklyn, New York, although more robust and long-term passive acoustic monitoring ("PAM") data indicating marine mammal population density would ideally have been collected ahead of project construction, the agency cannot wait until studies are completed to progress with development and must work with the data available now.

Comment Number: BOEM-2024-0008-1069-0032

Commenter Type: Advocacy Group
Organization: Clean Ocean Action

Comment Excerpt Text:

Several factors warrant further consideration than they have been given in the past, such as marine mammal impacts, turbine recyclability, impacts from once-through cooling systems, hydrologic changes to the Mid-Atlantic Cold Pool, and environmental justice. BOEM should incorporate these concerns and the cited sources into the analysis in the forthcoming EIS for the Atlantic Shores North project.

Comment Number: BOEM-2024-0008-1069-0004
Commenter Type: Advocacy Group
Organization: Clean Ocean Action

Comment Excerpt Text:

At the in-person public meeting, BOEM staff reported that the agency's mission is not as conservation-focused as the other agencies with whom they are required to consult, like the National Oceanic and Atmospheric Administration ("NOAA") on Endangered Species Act analysis, and consultation requires resolving any conflict between the two agencies' missions. Although BOEM's mission is focused on development rather than conservation, the agency's mission statement still calls for development to be "environmentally responsible" and their core values indicate that they are committed to protecting environmental resources, which includes marine wildlife.

Comment Number: BOEM-2024-0008-1069-0007
Commenter Type: Advocacy Group
Organization: Clean Ocean Action

Comment Excerpt Text:

To assess these impacts,
extensive monitoring and data collection must be required, and all monitoring and impact analysis reports should be made available to the public in real-time. Even if confidential business information needs to be redacted, it is crucial for the public to be involved in monitoring the projects. BOEM representatives stated that although developers are currently not required to publish their monitoring data publicly, there is no rule preventing them from doing so.

Comment Number: BOEM-2024-0008-1069-0008
Commenter Type: Advocacy Group
Organization: Clean Ocean Action

Comment Excerpt Text:

COA has submitted several public comments and released several public documents
outlining policy concerns regarding the lack of baseline data on impacts to the marine environment from offshore wind energy, including cumulative impacts.

Comment Number: BOEM-2024-0008-1070-0013
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

To comply with the 2005 amendments to the Outer Continental Shelf Lands Act (OCSLA), BOEM must ensure that all activities related to renewable energy development on the OCS are "carried out in a manner that provides forprotection of the environment." [Footnote 25: 43 U.S.C. 1337 (p)(4)(B).] BOEM's regulations under those amendments require Atlantic Shores North to plan and conduct the project in a manner that does not cause "undue harm or damage" to natural resources or wildlife.

Comment Number: BOEM-2024-0008-1070-0014
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

The project must comply with the federal Endangered Species Act (ESA) and Marine Mammal Protection Act (MMPA) before any activities are undertaken. [Footnote 27: 30 C.F.R 585.801(a), (b).] As discussed previously, BOEM is also obligated by NEPA to consider the full range of potential impacts on all marine mammal and sea turtle species. We recommend BOEM review the mitigation measures we provide in Attachment 1 and use them to inform requirements for Atlantic Shore North's development.

Comment Number: BOEM-2024-0008-1070-0004
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

We submit the following comments to guide BOEM in meeting its obligations under the National Environmental Policy Act (NEPA) in preparing a Draft EIS for Atlantic Shores North. Public comment is only one opportunity to meaningfully engage in the BOEM offshore wind development process. Direct outreach between stakeholders, such as eNGOs, and developers is another important opportunity to collaborate and address challenges. While we acknowledge Atlantic Shores North's assertion in the COP of engaging with eNGOs, [Footnote 7: Id. at 1-32.] it is imperative to ensure that such engagement is consistent and substantive.

Comment Number: BOEM-2024-0008-1070-0046
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

As discussed above for birds, we question why the Avian and Bat Survey Plan is not available for public review and urge BOEM and the developer to ensure that it is made available for public comment for the Draft EIS.

Comment Number: BOEM-2024-0008-1070-0047
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

We encourage BOEM to issue the Draft EIS for the Atlantic Shores North Project, and urge the agency to work with Atlantic Shores North to ensure that both the agency and the public are working with complete information on potential impacts as well as planned mitigation and monitoring measures.

Comment Number: BOEM-2024-0008-1070-0005
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

BOEM must make every attempt to obtain and disclose data necessary to its environmental impact analysis in the Draft EIS. The simple assertion that no information or inadequate information exists will not suffice.

Comment Number: BOEM-2024-0008-1070-0006
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

If information cannot reasonably be obtained, then the agency must state that such information is incomplete or unavailable; state the relevance of the incomplete or unavailable information to evaluating reasonably foreseeable significant effects on the human environment; summarize existing credible scientific evidence that is relevant to evaluating the reasonably foreseeable significant effects on the human environment; and evaluate such effects based upon theoretical approaches or research methods generally accepted in the scientific community. [Footnote 11: 40 C.F.R. 1502.21(c).] Such requirements become acutely important in cases where, as here, so much about an activity's impacts depend on newly emerging science. NEPA does not permit agencies to "ignore available information that undermines their environmental impact conclusions."

Comment Number: BOEM-2024-0008-1083-0003
Commenter Type: Local Government
Organization: Borough of Sea Girt, New Jersey

Comment Excerpt Text:

Furthermore, the Borough of Sea Girt was excluded from the decision-making process regarding the cable landing point on our coastline, directly impacting our residents without regard to long lasting impacts to o ur residents, our wildlife and our ocean above, on and below the water and including the seafloor itself.

Comment Number: BOEM-2024-0008-1094-0002
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

Time submitted for public comment is insufficient for meaningful review and participation.

Comment Number: BOEM-2024-0008-1094-0004
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

Public meetings did not provide for meaningful participation of stakeholders from impacted communities of Long Beach Island.

Comments from citizen stakeholders are chilled for the benefit of wind developers.

Utilization of Project Design Envelope submissions is not rational and results in unreasonable benefit to wind developers.

BOEM administrative process favors the private interests of offshore wind developers to the detriment of the citizen stakeholders.

Comment Number: BOEM-2024-0008-1094-0005
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

Segregation of lease area for two projects was unlawful.

Comment Number: BOEM-2024-0008-1096-0013
Commenter Type: Individual
Commenter: Teresa Boyle-Vellucci

Comment Excerpt Text:

We need the US government, the BOEM, Governor Murphy and our legislators as well as the NJDEP and the BPU to be responsible stewards of our ocean, rather than selling out our ocean, our ocean sea life and our community. We do not need the industrialization of our Atlantic Ocean.

Comment Number: BOEM-2024-0008-1096-0004
Commenter Type: Individual
Commenter: Teresa Boyle-Vellucci

Comment Excerpt Text:

Moreover, during the April 16, 2024 public meeting, the initial presentations, prior to public comment, made reference to the importance of involving stakeholders in the environmental impact statement process/evaluation. This project is proposed to be located directly off the shores of Long Beach Island, New Jersey. Yet none of the three in-person BOEM's public meetings were held in Long Beach Island.

Instead, they were located 50 miles from Long beach Island in Asbury Park, NJ and then over 100 miles in NY. That reality speaks volumes as to the BOEM's lack of true commitment to engage with the community that is directly impacted, and this needs to be remedied, as an initial matter, with an in-person meeting in Long Beach Island immediately.

Comment Number: BOEM-2024-0008-1098-0003
Commenter Type: Individual
Commenter: Denise Boccia

Comment Excerpt Text:

This Notice of Intent for public comment neglected to include an in person meeting on Long Beach Island, NJ where the unavoidable impacts will poke the very people who live there. Why was BOEM not willing to have this meeting? The BOEM can receive a million artificial comments in support of this NOI but they aren't worth one comment from people who actually live in the impacted communities of these proposed projects.

Comment Number: BOEM-2024-0008-1101-0001
Commenter Type: Individual
Commenter: Eileen Barker

Comment Excerpt Text:

My comments will be based on the fact that the Atlantic Shores North Project, as is Atlantic Shores South Project, when built will be CONTRARY to President Biden's EXECUTIVE ORDER 14008, January 27,2021 that stated the policy of his administration is to use its agencies to fight Climate Change with a government wide approach to "PROTECT PUBLIC HEALTH, CONSERVE OUR LANDS, WATERS AND BIODIVERSITY
" ...to "DELIVER ECONOMIC GROWTH, especially through innovation,commercialization,and deployment of clean energy technology and infrastucture..."

Comment Number: BOEM-2024-0008-1106-0001
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

We have reviewed the March 18, 2024, Federal Register Notice of Intent (NOI) for the Bureau of Ocean Energy Management (BOEM) to prepare an Environmental Impact Statement (EIS) for the Atlantic Shores North project (Project), a proposed wind energy facility within the BOEM Renewable Energy Lease Area OCS-A 0549 (Lease Area). The EIS will consider whether to approve, approve with modifications, or disapprove a Construction and Operations Plan (COP) submitted by Atlantic Shores Offshore Wind, LLC (Atlantic Shores), which includes the construction, operation, and eventual decommissioning of an offshore wind facility located on the outer continental shelf (OCS) approximately 8.4 statute miles off New Jersey and 60 miles offshore of New York. The Project proposes to construct up to 157 wind turbine generators (WTGs); up to 8 small, 4 medium, or 3 large offshore substations (OSS); up to 1 permanent meteorological (met) tower; up to 2 temporary meteorological and oceanographic (metocean) buoys; and associated interarray cables and scour protection. Two offshore export cable corridors for alternating HVAC and HVDC cables are proposed, one with landfall proposed in Sea Girt, New Jersey, and the other proposing landfall in either the New York City area or in the Asbury Park, New Jersey, area. The NOI does not mention activities for port facilities or operations and maintenance (O&M)

facilities.

Comment Number: BOEM-2024-0008-1106-0002
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

This letter responds to your request for information from us, both as a cooperating agency on this project with legal jurisdiction and special expertise over marine trust resources and fishery operations, and as a consulting agency under the Magnuson-Stevens Fishery Conservation and Management Act (MSA), the Fish and Wildlife Coordination Act (FWCA), and the Endangered Species Act (ESA). We are also an action agency for this project to the extent that NOAA's National Marine Fisheries Service (NMFS) may provide Incidental Take Authorizations (ITAs) under the Marine Mammal Protection Act (MMPA). We understand that Atlantic Shores North intends to apply for an Incidental Take Regulation/Letters of Authorization (ITR/LOAs) pursuant to section 101(a)(5)(A) of the MMPA. If, after independent review, we deem the final EIS sufficient, we intend to adopt your final EIS to satisfy our independent obligations under the National Environmental Policy Act (NEPA) and the Council on Environmental Quality (CEQ regulations (2020)) for our proposal to issue the MMPA authorization.

Herein, we provide information and technical assistance related to significant issues and analyses for the EIS related to resource concerns in the Project area, including any associated consultation and authorization requirements and their respective sufficiency needs. More detailed information is provided in Attachment A.

Comment Number: BOEM-2024-0008-1106-0035
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

Environmental Consequences/Impacts Analyses
All relevant impact producing factors affecting marine resources should be evaluated under the Environmental Consequences section of the EIS. In accordance with the information provided above, we recommend the Environmental Consequences section of the EIS address the following topics. Further, we recommend that the EIS address all stressors and activities outlined in the ESA, EFH, and Fisheries Socioeconomic Impacts information needs documents available on our website [Footnote 11: https://www.fisheries.noaa.gov/new-england-mid-atlantic/science-data/technical- guidance-offshore-wind-energy-projects-greater-atlantic-region].

Comment Number: BOEM-2024-0008-1106-0006
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

Conclusion
Thank you for considering our comments during this important scoping process. We provide our technical comments for the Atlantic Shores North project in Attachment A. We will continue to support the Administration's efforts to advance offshore renewable energy through our participation in the offshore wind development regulatory and planning processes. We are committed to implementing our national

strategic goals to maximize fishing opportunities while ensuring the sustainability of fisheries and fishing communities. In addition, we strive to recover and conserve protected species while supporting responsible offshore wind resource development. To ensure we can continue to meet our collective objectives and ambitious timelines, we should strive to capitalize and build upon our collaboration on recent projects and integrate lessons learned into future project developments and reviews. This will improve the quality of NEPA documents for this and future projects, expedite our reviews, avoid delays, and increase process efficiencies. We look forward to continuing to work with you in this regard. Should you have any questions regarding these comments, please contact Sue Tuxbury in our Habitat and Ecosystem Services Division at (978) 281-9176 or susan.tuxbury@noaa.gov. For questions regarding the EFH consultation, please contact Kira Dacanay in our Habitat and Ecosystem Services Division at kira.dacanay@noaa.gov. For questions regarding ESA and Section 7 comments, please contact Julie Crocker in our Protected Resources Division at (978) 282-8480 or julie.crocker@noaa.gov. For questions regarding MMPA Incidental Take Authorizations, please contact Jaclyn Daly in the Office of Protected Resources at (301) 427- 8438 or jaclyn.daly@noaa.gov.

Comment Number: BOEM-2024-0008-1108-0024
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

- EPA recommends close coordination with the U.S. Army Corps of Engineers, National Marine Fisheries Service, appropriate state Coastal Zone Management offices, and others for the portions of the proposed work that falls under their respective jurisdictions.

Comment Number: BOEM-2024-0008-1108-0033
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

The U.S. Environmental Protection Agency (EPA) has reviewed the request by Bureau of Ocean Energy Management (BOEM) to provide scoping comments in anticipation of the preparation of an Environmental Impact Statement (EIS) for the Atlantic Shores North Project. This review was conducted in accordance with EPA's responsibilities pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations (40 CFR Sections 1500-1508) and Section 309 of the Clean Air Act.

Comment Number: BOEM-2024-0008-1108-0034
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

Atlantic Shores Offshore Wind, LLC proposes an offshore wind energy generation project within Lease Area (OCS-A 0549) located in federal waters on the outer continental shelf (OCS), approximately 8.4 miles from the New Jersey shoreline at its closest point. Offshore components for the Atlantic Shores North Project include up to 157 Wind Turbine Generators (WTG)s; up to 8 small, 4 medium, or 3 large

OSSs; foundations and associated scour protection for WTGs; associated inter-array cables; up to 8 High-Voltage Alternating Current (HVAC) and High-Voltage Direct Current (HVDC) submarine export cable routes in 2 offshore Export Cable Corridors (ECCs); cable protection; up to 1 permanent meteorological tower; and up to 2 temporary meteorological and oceanographic buoys. Energy will be delivered to the shore by export cables that will travel within designed export cable corridors to landfall sites in New York and New Jersey. Multiple onshore interconnection cable routes have been identified from the potential landfall sites to five proposed points of interconnection.
The NOI commences the public scoping process for identifying potential issues and alternatives that should be analyzed for consideration in the Atlantic Shores North EIS. Our comments are based on information provided in the NOI, the Atlantic Shores Offshore Wind Construction and Operations Plan (COP), and various interagency meetings. The construction and operation of the Project could result in a wide range of impacts to resources that are within EPA's areas of jurisdiction and expertise. The COP identifies many of the major environmental issues that should be fully examined during the NEPA process. Our scoping comments are offered to help BOEM develop a comprehensive EIS that identifies and discusses measures to avoid or mitigate impacts and informs project permitting that will follow the NEPA process. The enclosed detailed comments are also intended to be consistent with our ongoing work in the Region to support local communities and reduce environmental impacts.

Comment Number: BOEM-2024-0008-1108-0035
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

In addition to coordination with affected states and local communities, we recommend that BOEM continue to work closely with federal agencies and tribes with relevant air, water and natural resource responsibilities during the development of the EIS. We encourage BOEM to continue to expand upon past coordination with the fishing industry and state and federal agencies charged with protecting fishing and marine mammal resources. In particular, we encourage BOEM to take the necessary time to develop and present information in the EIS that fully describes existing conditions and supports a discussion of the likely impacts of each alternative. We appreciate BOEM's efforts to date to include our agency in meetings and discussions regarding the NEPA process for the project.

Thank you for the opportunity to provide scoping comments for the Project. We believe the issues identified below can be fully addressed in the NEPA process, and we are willing to work with your agency to develop a strategy to achieve that goal. Should you have any questions or wish to discuss our concerns, please contact Guy Burke, the project lead at (212) 637-3635 or Burke.Guy@epa.gov and copy Region2_EnvReviews@epa.gov.

Comment Number: BOEM-2024-0008-1108-0037
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

- EPA encourages BOEM to review our comments from prior EIS review comment letters and matrices when preparing the EIS for Atlantic Shores North. These previous comments provide suggestions to refine and/or strengthen the impacts classifications and analysis.

Comment Number: BOEM-2024-0008-1111-0001
Commenter Type: Advocacy Group
Commenter: Jack Fullmer
Organization: New Jersey Council of Divers and Clubs

Comment Excerpt Text:

The newest threat is the industrialization of the waters off the NJ coast by the pushed, rushed, and overly extensive wind farm development.
Needless to say, a DEIS of over 1000 pages is very difficult and time consuming to wade through, and a 45-day comment period is woefully inadequate and should be extended.

Comment Number: BOEM-2024-0008-1111-0002
Commenter Type: Advocacy Group
Commenter: Jack Fullmer
Organization: New Jersey Council of Divers and Clubs

Comment Excerpt Text:

Nor did it help that a resource we are interested in protecting (shipwrecks) is considered a confidential resource by BOEM so that it is impossible to determine if an adequate or complete underwater survey was performed, or if known wrecks that often cover up were actually detected by survey activity.

Comment Number: BOEM-2024-0008-1111-0008
Commenter Type: Advocacy Group
Commenter: Jack Fullmer
Organization: New Jersey Council of Divers and Clubs

Comment Excerpt Text:

And why are no coordinates (even rough coordinates) given for the Wind Turbine Area in the DEIS (OCS-A-0549) for Atlantic Shores North? Without even rough coordinates, no fishing or dive boat captains familiar with this area can tell what wrecks and reefs could be impacted by the wind farms and numerous cables.

Comment Number: BOEM-2024-0008-1112-0012
Commenter Type: Local Government
Organization: Sea Girt New Jersey

Comment Excerpt Text:

A concern that for such a substantial and environmentally sensitive project, the public comment period is just too short,too immediate, and generally inconsistent with good government practice

Comment Number: BOEM-2024-0008-1112-0013
Commenter Type: Local Government
Organization: Sea Girt New Jersey

Comment Excerpt Text:

6. Please advise if the Sea Girt Planning Board and / or the Borough of Sea Girt will have any future opportunities to publicly comment/ object to the subject proposal.

7. I would also ask that you please advise as to what other ways the Planning Board Objections can be further clarified/ memorialized.

Comment Number: BOEM-2024-0008-1120-0001
Commenter Type: Individual
Commenter: Joseph Ciccone

Comment Excerpt Text:

1. If only 45 days are allowed for comment, then the material should be made available earlier.

2. Tower lighting: If lights are not on except when aircraft is detected will non commercial (private) aircraft also be detected? (Radar V, IFF system)

3. If Brooklyn Gowanus Substation is selected, it may require expansion south towards the veterans pier, which is used by water ferry. This is the closest public transportation for the New Bay Ridge Senior Center (15 Bay Ridge Ave).

4. Does the impact statement address the affect the cable will have on the developing oyster beds, both the existing ones and those being re-seeded by groups like one billion oysters?

5. When will cores be taken as the proposed locations to test the proposed possible bases?

6. Why are some Appendices not available On-Line?

Why are some Appendices Confidential?

Why is one Appendices Redacted?

7. We cannot comment on what we cannot see. Any current open item, when decided should allow for an additional 45 day comment period.

Comment Number: BOEM-2024-0008-1131-0001
Commenter Type: Advocacy Group
Commenter: Carl Van Warmerdam
Organization: Deep Sea Defenders

Comment Excerpt Text:

I first of all would like to ask BOEM to extend the public comment period for this. It's seems inadequate, 30 days, should at least be 60 but I would recommend also that this project be disapproved.

Comment Number: BOEM-2024-0008-1139-0002
Commenter Type: Individual
Commenter: Patricia Brennan

Comment Excerpt Text:

So I really wish that the commenting period could be extended as well as proper environmental studies that weren't paid for by the company that was putting them in be done and that BOEM also follows their own rules about protecting the environment.

Comment Number: BOEM-2024-0008-1145-0002

Commenter Type: Individual
Commenter: Karen Sours

Comment Excerpt Text:

I also would like to ask why aren't the in person meetings going to be held closer to Long Beach Island which is where this will be most impacted.

Comment Number: BOEM-2024-0008-1157-0003
Commenter Type: Individual
Commenter: John Deputato

Comment Excerpt Text:

I would like to see BOEM take a stance from ready, fire, aim to one of taking a look at what would actually happen to tourism on this island. I am concerned that the public forum for this -- for public comments, there has been nothing scheduled near Long Beach Island and I would like to understand why the public forums where people can come and actually appear in public, there is nothing near the island where you are putting the turbines.

Comment Number: BOEM-2024-0008-1159-0001
Commenter Type: Advocacy Group
Commenter: Adam Nolan
Organization: New Jersey League of Conservation Voters

Comment Excerpt Text:

I am pleased to see the Bureau of Ocean Energy Management moving forward with the next steps towards assessing the potential impacts of the proposed offshore wind energy project by Atlantic Shores. Initiating the environmental impact statement process as required by NEPA demonstrates a commitment to thorough evaluation and public engagement.

Comment Number: BOEM-2024-0008-1159-0003
Commenter Type: Advocacy Group
Commenter: Adam Nolan
Organization: New Jersey League of Conservation Voters

Comment Excerpt Text:

The construction and operation of offshore wind facilities involves complex logistical challenges. The EIS allows us to study the challenges and potential impacts and assess the best ways to mitigate them and prevent adverse outcomes.

It is essential that the EIS process also incorporates inputs from stakeholders representing the diverse communities and their perspectives. I'd also like to applaud Atlantic Shores for their commitment to transparency and collaboration throughout this process and engaging with local communities stakeholders and regulatory agencies will be crucial in addressing concerns, mitigating risks and ensuring a responsible and sustainable development of offshore wind energy with maximum benefits for the community.

Comment Number: BOEM-2024-0008-1169-0005
Commenter Type: Local Government
Commenter: Justin Macko
Organization: Borough of Sea Girt

Comment Excerpt Text:

The Borough at no time has been contacted directly by BOEM or the BPU until after those bids were submitted on April 3. They have never been asked for local government input nor from the residents.

Comment Number: BOEM-2024-0008-1174-0001
Commenter Type: Individual
Commenter: Allen Magrini

Comment Excerpt Text:

My thoughts are this, we have repeatedly asked BOEM and others to have a public hearing here on Long Beach Island due to the fact that the tallest turbines in the world at 1,100 feet, that is twice the size of the Washington Monument as well as the closest turbines in the world at 8.4 miles right off the shore of Long Beach Island.

We have asked in numerous places to have a public hearing. Seems that the public hearings which were not hearings at all were held in Asbury Park and two in New York City.

Comment Number: BOEM-2024-0008-1203-0006
Commenter Type: Individual
Commenter: Robyn Federico

Comment Excerpt Text:

And I do agree that the LBI people should have a hearing on the island and not far away so therefore they could have their voices heard.

Comment Number: BOEM-2024-0008-1205-0001
Commenter Type: Advocacy Group
Commenter: Bob Stern
Organization: Save Long Beach Island Incorporated

Comment Excerpt Text:

And to understand that for people who aren't familiar with impact statements, let me explain what an impact statement is supposed to do because it's really not designed to just present the impacts of the agency proposal, it's designed to track the agency's decision process and inject environmental factors into that.

And unfortunately that has not occurred in this process. We heard BOEM representatives talk about all the decisions they have made whittling down areas and projects and so on that should have been done with EIS review, and more importantly, it should have been done with public input. That was not done, the only way to resurrect to improve and correct that at this point would be for this EIS to basically reconsider a lot of those decisions and we will be commenting to you extensively to do that.

A.3.18 Other Resources and Uses

Comments associated with this issue appear in the sub-issues below.

A.3.18.1. Aviation

Comment Number: BOEM-2024-0008-0511-0002
Commenter Type: Individual
Commenter: Eleanor Hill

Comment Excerpt Text:

The turbines also inhibit the ability for radar to work in both planes and boats

---

Comment Number: BOEM-2024-0008-0813-0007
Commenter Type: Individual
Commenter: Laurie Maxwell

Comment Excerpt Text:

In addition, according to US Dept of Energy's own Wind Energy Technology Office, "Wind turbines can cause interference for radar systems because their large towers and moving blades reflect electromagnetic radiation. This interference can create clutter and reduce detection sensitivity, interfering with target tracking and impeding critical weather forecasting" (energy.gov). With Newark, New York, Philadelphia airports and Mc Guire AFB using this airspace on a daily basis-this is a recipe for disaster!

Comment Number: BOEM-2024-0008-0922-0006
Commenter Type: Individual
Commenter: John Maxwell

Comment Excerpt Text:

"Wind turbines can cause interference for radar systems because their large towers and moving blades reflect electromagnetic radiation. This interference can create clutter and reduce detection sensitivity, interfering with target tracking and impeding critical weather forecasting" (energy.gov). With Newark, New York, Philadelphia airports and Mc Guire AFB using this airspace on a daily basis-this is a recipe for disaster!

Comment Number: BOEM-2024-0008-1050-0004
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

The project is too close to ACY airport and Air Force Base, and is proven to affect flight radar and paths, including national security.

Comment Number: BOEM-2024-0008-1137-0003

Commenter Type: Advocacy Group
Commenter: William Link
Organization: John Birch Society

Comment Excerpt Text:

You understand with over a thousand feet high, the only way to fix the turbines is using helicopters, very dangerous especially with winds.

Let me explain something. Wind at ground level can be bad. At a thousand feet up, that wind is way more dangerous and it's not going to be safe for these crews to be doing that. Also we know, we have hurricanes, we have Nor Easters, we have all kinds of bad weather that can affect the windmills.

A.3.18.2. Marine Minerals

No comments are associated with this issue.

A.3.18.3. Military

Comment Number: BOEM-2024-0008-0005-0007
Commenter Type: Individual
Commenter: James Binder

Comment Excerpt Text:

A thorough analysis has not been done in past EISs to describe how security will be provided for the windmills should there be terrorist activity or destructive actions by this country's adversaries. How will this be done? The Navy and Coast Guard will not have the resources to provide security. The Coast Guard is already stressed, closing stations and limiting activities to protect recreational and commercial ships. How will back up power be provided to eliminate loss of power, blackouts and emergency response. Please provide a thorough analysis of how security will be provided for these exposed wind generators and substations.

Comment Number: BOEM-2024-0008-0007-0005
Commenter Type: Individual
Commenter: Diane Snelson

Comment Excerpt Text:

The presence of these wind energy structures could lead to localized, long-term, moderate impacts on radar systems. Development of offshore wind projects could incrementally decrease the effectiveness of individual radar systems as noted by the military. Navigation safety and radar will be compromised. These projects will deter search and rescue operations within the 1,400 miles of development.

Comment Number: BOEM-2024-0008-0453-0001
Commenter Type: Individual
Commenter: Jody Bielski

Comment Excerpt Text:

There hasn't been enough research for this kind on impact on and in our oceans. Securities are going to be

compromised. Coast guard, Navy, air force.

Comment Number: BOEM-2024-0008-0524-0009
Commenter Type: Individual
Commenter: Sharon Mahoney

Comment Excerpt Text:

Military Aviation and Installation Assurance Siting Clearinghouse reviews and comments on proposed wind turbine projects location with respect to operations of the US military. The Clearinghouse did issue comments to BOEM on the NY Bight in 2020. Has the Clearinghouse issued comments on the Atlantic Shores proposals for compliance? These comments, if they exist, should be made public. On their website this morning on project under review, there was no mention of Atlantic Shores project. My research found that Dept of Defense, especially US Airforce and Navy have many issues with anything within 12 nm of the shoreline. Nexrad weather radar and NORAD surveillance will be adversely affected by wind turbines over 1,000 feet tall within 12 nm of the coast. Please provide the findings report from the Clearinghouse.

Comment Number: BOEM-2024-0008-0526-0002
Commenter Type: Individual
Commenter: Darlene Holden

Comment Excerpt Text:

Our ships & fighter jets will be put at risk with navigation issues, and the coast guard will be put at further risk during rescues. I have worked on fighter jets in the Air Force and have seen the results of only momentary loss of navigation with loss of lives

Comment Number: BOEM-2024-0008-0538-0007
Commenter Type: Individual
Commenter: Mary Smith

Comment Excerpt Text:

These turbines create difficulties for the Coast Guard and concerns for the Dept of Defense.

Comment Number: BOEM-2024-0008-0546-0001
Commenter Type: Individual
Commenter: S W

Comment Excerpt Text:

Stop this destruction of our marine life & ocean. It is a danger to our country's safety as radar is blocked by these monstrosities. We will not be able to detect a foreign attack.

Comment Number: BOEM-2024-0008-0567-0003
Commenter Type: Individual
Commenter: Maryanne Klemmer

Comment Excerpt Text:

As well as jeopardize our National Security.

Comment Number: BOEM-2024-0008-0599-0007
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

Additionally, the Project might cause conflicts with military activities, air traffic, land-based radar services, cables and pipelines, and scientific surveys.

Comment Number: BOEM-2024-0008-0611-0017
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

Military Preparedness. The EIS needs to include an analysis of the interference by the Atlantic Shores North (and South) wind turbines with our NORAD military air radar defense system in Gibbsboro, New Jersey. Such a study was not included in the draft EIS on Atlantic Shores South, an unconscionable omission particularly at a time of heightened world tension. If that study shows significant impairment of our defense capability, we would expect that this would be another reason for lease cancellation as described above.

Comment Number: BOEM-2024-0008-0611-0049
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

Section 5.7.1 Light Offshore Says the navigation lights have a range of 3-5 nm, which conflicts with section 3.2 of Appendix M-1 Visual Impact Assessment which states the limits as 13 miles and includes maps showing the extent of that visibility. Should clarify in the DEIS whether any such ADLS systems such as are being proposed have yet been approved by the FAA for large offshore wind projects; and if so, will this be a ROD requirement? Also the claims of reduced frequency for the aviation lights being activated should be clarified to see if the numbers presented included military as well as commercial/private flights.

Comment Number: BOEM-2024-0008-0640-0001
Commenter Type: Individual
Commenter: Anne Baker

Comment Excerpt Text:

And then we have NATIONAL SECURITY ISSUES. We had very few attacks on our mainland from Japan..but they tried. In this case, these industries will plunk down these Eiffel Tower sized steel structures & we have YET to hear how they'll be protected from our enemies who are far more advanced in attack methods than the Japanese were.

Comment Number: BOEM-2024-0008-0939-0002
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

Additionally the interference with the Military Base closeby is a security issue which Congressman Jeff VanDrew has vehemently opposed.

Comment Number: BOEM-2024-0008-0964-0009
Commenter Type: Individual
Commenter: Sally Barbato

Comment Excerpt Text:

Lastly, there are radar and safety concerns highlighted by military officials. Radar interference and navigational interference. There are national security issues that go hand and hand with this.

Comment Number: BOEM-2024-0008-1029-0010
Commenter Type: Individual
Commenter: Douglas Crawford

Comment Excerpt Text:

The impact to radar in my opinion has been severely underplayed. The impact of not impairing local air and sea navigation and Coast Guard search and rescue cannot be overstated. You should be required to coordinate with the US military on the national security risks to coastal thread detection AS WELL AS the functioning of RADAR GUIDED MISSILE DEFENSE SYSTEMS that may be required along the coast in war.

Comment Number: BOEM-2024-0008-1029-0012
Commenter Type: Individual
Commenter: Douglas Crawford

Comment Excerpt Text:

Additionally, the risk of the rigs and substations being used for foreign surveillance has not even been broached! These are foreign companies in charge of these operations, some with part foreign state ownership, that can also have alliances with enemies of the US. This alone should make prevent projects from being approved.

Comment Number: BOEM-2024-0008-1040-0011
Commenter Type: Individual
Commenter: Denise Boccia

Comment Excerpt Text:

Will this EIS contain a study of the potential radar interference by the turbines with our military air radars in Gibbsboro New Jersey?

Comment Number: BOEM-2024-0008-1083-0005
Commenter Type: Local Government
Organization: Borough of Sea Girt, New Jersey

Comment Excerpt Text:

Additionally, Representative Chris Smith (4th NJ) has called for a report to study offshore wind projects in the North Atlantic and Mid-Atlantic Planning Areas and their potential to weaken, degrade, interfere with, or nullify the performance and capabilities of radar relied upon by commercial aviation, military aviation, space launch vehicles, or other commercial space launch activities; and the development of offshore wind projects in the North Atlantic and Mid-Atlantic Planning Areas potential to degrade the capabilities
of the Federal Aviation Administration to monitor United States airspace, or hinder commercial, private, or military aviation activities. We implore that this study be completed and published to ensure th e protection of the airspace not just over the Borough of Sea Girt, but along the eastern seaboard of the United States.

Comment Number: BOEM-2024-0008-1133-0002
Commenter Type: Individual
Commenter: Diane Snelson

Comment Excerpt Text:

Even the military has expressed concerns that the presence of the wind energy structures would lead to localized long term impacts on the radar systems.

Comment Number: BOEM-2024-0008-1138-0002
Commenter Type: Individual
Commenter: Kathleen Harper

Comment Excerpt Text:

Another issue that has me worried are the national security, they are tall, they mess up with radar, they mess up with the coast guard's ability to save people. It's not good for us on the east coast because they are not going to be able to tell if there is an attack on our shoreline from the ocean with those turbines out in the water.

Comment Number: BOEM-2024-0008-1181-0001
Commenter Type: Individual
Commenter: Roberta Elizabeth Mauch

Comment Excerpt Text:

What kind of studies have been done, I don't hear anybody mention it how this effects the military?

I mean the conflict of safety of our eastern shore board, I feel it leaves us vulnerable and how is it protecting us in a war. Nobody mentioned anything about that. So I wanted to bring up things that weren't talked about. Thank you.

A.3.18.4. Research Activities

Comment Number: BOEM-2024-0008-0114-0001
Commenter Type: Individual
Commenter: Michelle Leo

Comment Excerpt Text:

I am submitting public comment opposing the proposed Atlantic Shores North Project. I am backing up a bit to speak on the attached Equinor's
Evaluation of Pile Driving Restriction in the Month of May that The Project's purpose is to construct and operate a commercial-scale offshore wind facility, which is needed to help fulfill the States renewable energy goals. A filed an application for a Letter of Authorization (LOA) pursuant to Section 101(a)(5) of the Marine Mammal Protection Act (MMPA) and 50 Code of Federal Regulations (CFR) Part 216 Subpart I to allow for the incidental harassment of small numbers of marine mammals resulting from construction activities in the pile driving restrictions from January through April to avoid and minimize potential impacts to the North Atlantic right whale (NARW). Further, the Proposed Rule included a proposed restriction on pile driving from January through April. It was recommended that the pile driving exception be extended to May, however because of costs, Equinor is getting to circumvent a public comment and NOAA regulations.
Lease Area and Submarine Export Cable Route Corridor during the construction of an offshore wind farm. Let's focus on that last sentence, "incidental harassment" there is no mitigation for the cable laying. This application was deemed complete by NOAA to work around seasonal pile driving. However, NOAA granted Equinor to the level of least practicable adverse impacts. From the letter, "However, as described below, the extension of the pile driving restriction through May would yield no meaningful benefit for NARW, but would negatively impact the Project." "The Project's acoustic modeling, marine mammal exposure estimation, and proposed mitigation measures as described in the LOA application were also based on the timing associated with a January through April pile driving.
restriction. For the reasons detailed in this letter, the extension of the pile driving restriction through the month of May is not warranted to protect the NARW and is not practicable to implement at this phase of the Project," again self-monitoring. There is no guarantee that a NARW will not be in the lease area. Futhermore, NARW have been monitored in the NY Bight, noted in attached, page 3, "Finally, long-term detection and comprehensive sighting data from aerial, vessel, buoy, and Slocum autonomous long-endurance ocean glider surveys shows very low observations/detections of NARW in the New York Bight." Low detection of a NARW is still a detection. with no observations/detections within the EW Lease Area during the month of May from 2010-2023 (Figure 2). When comparing NARW observations in the New York Bight region to those off Massachusetts during the month of May, the right whale sighting advisory system detected 139 right whales in the entire New York Bight (not limited to the Lease Area), whereas a total of 2,253 right whales were detected off Massachusetts (www.whalemap.org). These data present strong evidence based on the best available scientific information that NARW presence is relatively low in the New York Bight during the month of May." "Relatively low," again, still a presence.

I strongly urge BOEM to stop Atlantic Shores North Project.

See attached Equinor Empire Wind Final Rule - NARW, dated October 2023.

Atlantic Shores will be in NY Bight area and this project should not go through as planned. It is noted that best current scientific is being used, in 10 years BOEM will be saying you were wrong.

Comment Number: BOEM-2024-0008-0150-0001
Commenter Type: Individual
Commenter: Denise Brush

Comment Excerpt Text:

In mid-April Gov. Murphy released $3.7 million in additional funding for the state's Research & Monitoring Initiative which includes whale surveys, bird and bat tracking, and ocean circulation studies.

Comment Number: BOEM-2024-0008-0569-0005
Commenter Type: Individual
Commenter: Craig Osten

Comment Excerpt Text:

Are willing to put some kind of surety bond or security deposit in place to guarantee this work takes place. How will these turbines fair if there is severe weather offshore ? Has this been studied or tested ?

Comment Number: BOEM-2024-0008-0852-0001
Commenter Type: Individual
Commenter: Sylvia Lockwood

Comment Excerpt Text:

According to the Atlantic Shores North Construction and Operation plan Section 4.7 Marine Mammals and Table 4.7-1. Marine Mammal Species in the Mid- and North Atlantic Outer Continental Shelf states there are 338 North Atlantic Right Whales (of which approx. 70 are females capable of reproducing) which are protected by the Marine Mammal Protection Act and the Endangered Species Act. NOAA acknowledges that only 1/3 of NARW deaths are documented therefore this number would be less considering there have been another 4 documented cases of death thus far in 2024 along the East coast. There is currently a pending federal lawsuit naming the Interior Department, the Commerce Department, the Bureau of Ocean Energy Management, the National Marine Fisheries Service, and Dominion Energy for failure to complete a comprehensive analysis on the combined effects of offshore wind projects sited along the migratory path which includes designated critical areas of the North Atlantic Right Whale. As Atlantic Shores North is also located along the East coast and therefore within the North Atlantic Right Whale habitat path, it would seem prudent that BOEM delay preparing an environmental impact statement for this and any other East coast project until such time as a decision is made in that case.

Comment Number: BOEM-2024-0008-1007-0009
Commenter Type: State Government
Organization: New York State

Comment Excerpt Text:

4. Develop detailed environmental analyses for both onshore and offshore cables potentially affecting New York:

Comment Number: BOEM-2024-0008-1043-0009
Commenter Type: Local Government
Organization: Borough of Sea Girt, NJ Planning Board

Comment Excerpt Text:

A Concern regarding the seeming lack of qualified / distributed / substantiated research confirming that the project can be developed without causing substantial detriment to the public good

Comment Number: BOEM-2024-0008-1069-0021
Commenter Type: Advocacy Group
Organization: Clean Ocean Action

Comment Excerpt Text:

There has never been a study in the North Atlantic offshore environment to determine what species would be impacted by once-through cooling systems through impingement or entrainment; such a study should be conducted, both progr ammatically in the New York Bight and in the Atlantic Shores North lease area, before large-scale once-through cooling systems are put to use. At minimum, BOEM must specifically estimate the number of organisms to be entrained and/or impinged using ichthyoplankton population density.

Comment Number: BOEM-2024-0008-1069-0006
Commenter Type: Advocacy Group
Organization: Clean Ocean Action

Comment Excerpt Text:

At minimum, if BOEM is to rely on proposed projects to determine impacts that should have been studied before giving large-scale approvals, the developer and BOEM should be required to publish timely reports evaluating the project's environmental impacts, as well as establish clear guardrails and limits for impacts including from noise, pollution, habitat destruction, habitat modifications and electromagnetic fields (EMF).

Comment Number: BOEM-2024-0008-1070-0018
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

The New York-New Jersey Bight was previously a relatively under-surveyed area compared to some other areas of the East Coast and the distribution of North Atlantic right whales in this region is not well understood.

Comment Number: BOEM-2024-0008-1094-0008
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

Proposed action exaggerates the reef effect as a positive impact, which is not rational and is unsubstantiated.

Comment Number: BOEM-2024-0008-1111-0019
Commenter Type: Advocacy Group
Commenter: Jack Fullmer
Organization: New Jersey Council of Divers and Clubs

Comment Excerpt Text:

Atlantic Shores responded that they would not be doing more survey work this year. But what about the

proposed six NY Bight Wind turbine Areas and the export cables heading inshore.

Apparently, there is currently no fonnal process for evaluating the impacts of survey activity on the environment. However, the Notice to Mariners lists at least a number of different vessels doing surveys off the Jersey Coast (District 5) for wind farm development. The NJ Council of Divers and Clubs is concerned for the safety of that unique marine mammal that wears a SCUBA tank on his or her back, and is asking BOEM if this survey activity from the six NY bight wind farms and Empire Wind could endanger sport divers in the water.

Comment Number: BOEM-2024-0008-1160-0003
Commenter Type: Individual
Commenter: Tricia Devoi

Comment Excerpt Text:

urge BOEM to pause the project and all offshore wind projects until independent thorough environmental studies can be conducted and also until it's proven that these projects will not have a detrimental impact on marine mammals especially the North Atlantic Right Whale or the marine environment as a whole.

A.3.18.5. Other

Comment Number: BOEM-2024-0008-0837-0005
Commenter Type: Individual
Commenter: Chris Monahan

Comment Excerpt Text:

The installation of wind turbines so close to coastal areas may lead to increased noise, which could adversely affect the health and well-being of nearby residents. The overall quality of life for individuals living in proximity to the project could be diminished due to these disruptions.

Comment Number: BOEM-2024-0008-0910-0001
Commenter Type: Individual
Commenter: Cynthia Kasprzak

Comment Excerpt Text:

I am vehemently opposed to the construction of these offshore wind turbines along the Jersey Coast. We all know how destructive and corrosive salt water is to metal. According to a report from the National Renewable Energy Laboratory (Table 30), depending on make and model wind turbines are predominantly made of steel (66-79% of total turbine mass); fiberglass, resin or plastic (11-16%); iron or cast iron (5-17%); copper (1%); and aluminum (0-2%).

https://sciencing.com/salt-water-rust-metals-5150093.html

https://www.nrdc.org/press-releases/federal-court-navy-must-limit-long-range-sonar-use-protect-marine-mammal

https://phys.org/news/2024-01-qa-noisy-offshore-farms-disturb.html

https://seagrant.gso.uri.edu/oceansamp/pdf/presentation/present_gill_europe.pdf

The only thing wind turbines will do is make those investing in them rich. They are a temporary fix due to their inevitable destruction by salt water. Over time, the costs of maintaining these turbines will

eventually far outweigh the profits that investors will will make on them. And who will pay for their maintenance while others are stuffing their pockets? The consumer! Us! We the People! We don't want them! Period! The citizens of this country elect or politicians under the pretense that they will be working for us, not themselves! It's time for them to do their job! This is not what your constituency wants which leads us to not wanting those leaders responsible for this either. Off shore wind turbines will not be good for the environment in the long haul. In reality, it will be quite the opposite! It is pure folly to think they will be to our advantage. They will NOT!

Comment Number: BOEM-2024-0008-0928-0007
Commenter Type: State Government
Organization: NJDEP

Comment Excerpt Text:

A glossary would be a welcome addition to the Environmental Impact Statement. Terms like effect, impact, best management practice (BMP), mitigation, compensation, and cumulative can have different interpretations. For instance, what are best management practices outside of mitigation and monitoring? The NJ Coastal Zone Management Rules use "mitigation" to mean offsetting impacts when they occur. Compensation is sometimes interpreted as only claims-based funding, but it should always include funding to support the sustainability of fisheries. "Cumulative" may refer to the sum of all offshore wind activities, the sum of all anthropogenic activities, or a combination of environmental and anthropogenic stressors.

Comment Number: BOEM-2024-0008-0946-0001
Commenter Type: Advocacy Group
Organization: C.A.P.E.

Comment Excerpt Text:

Has there been research into the micro plastics that will come off the turbines from the constant salt water and wind abrasion? What happens to the seafood that will divert it? We already have enough of a problem with micro plastics in humans from tainted food consumption.

Comment Number: BOEM-2024-0008-0985-0007
Commenter Type: Individual
Commenter: Tony Alexander

Comment Excerpt Text:

Unknown impact on citizens health locally where wiring and transfer stations go online

---

Comment Number: BOEM-2024-0008-1043-0011
Commenter Type: Local Government
Organization: Borough of Sea Girt, NJ Planning Board

Comment Excerpt Text:

A concern as to why other seemingly similar projects (in other local/ national/ world-wide waterfront communities) have apparently been stopped / halted / abandoned

Comment Number: BOEM-2024-0008-1069-0013
Commenter Type: Advocacy Group
Organization: Clean Ocean Action

Comment Excerpt Text:

BOEM and Atlantic Shores Offshore Wind, LLC ("Atlantic Shores") claim that turbine parts are recyclable: BOEM has stated that over 95% of a wind turbine can be recycled, [Footnote 11: BUREAU OF OCEAN ENERGY MGMT. (@BOEM), X, (Mar. 18, 2024, 8:49 AM), https://twitter.com/BOEM/status/1769707760420098331] but Atlantic Shores states that not all components of the Atlantic Shores North project may be recyclable, such as the fiberglass components. [Footnote 12: Atlantic Shores Offshore Wind, Atlantic Shores Offshore Wind Construction and Operations Plan, vol. 2, at 6-1 (Mar. 2024).] According to BOEM representatives, the agency defines recyclability by whether commercial processes exist that can recycle them, rather than whether a market for the recycled products actually exists. If there is no end market for recycled materials, recycled products will not be produced due to a lack of economic viability. At best, they will be produced in much lower numbers than can cover the increase in demand for new turbine products. In any case, the theoretical recyclability of wind turbine parts should not be counted toward wind projects' environmental benefits without evidence that there are useful end markets for the products.

Comment Number: BOEM-2024-0008-1069-0014
Commenter Type: Advocacy Group
Organization: Clean Ocean Action

Comment Excerpt Text:

BOEM also must consider whether its recycling assumptions rely on new facilities being constructed, and the environmental impact of constructing those facilities.
Although existing facilities are believed to be able to technically handle the volume of turbines to be disposed, companies will not transport the materials to these facilities if it is prohibitively expensive to do so. [Footnote 13: Walzberg et al, Regional Representation of Wind Stakeholders' End-of-life Behaviors and their Impact on Wind Blade Circularity, 25 ISCIENCE (Aug. 19, 2022), https://doi.org/10.1016/j.isci.2022.104734] BOEM should incorporate the end market and facilities elements into its analysis of recyclability as well as life-cycle greenhouse gas emissions.

Comment Number: BOEM-2024-0008-1096-0009
Commenter Type: Individual
Commenter: Teresa Boyle-Vellucci

Comment Excerpt Text:

Another consideration that while it may seem a soft consideration, we believe is something worth consideration, mental health. There is a lot of lip service given by our elected official to the mental health crisis in our nation and the need to address the same. People often say that when driving onto LBI folks feel a real sense of relief, and this applies to our adult and adolescents population, and there is no question our young people are struggling more than ever. Long Beach Island is a place for vacationing and disconnecting from the stressors of life. These windfarms will ruin our community and comfort it gives to all those who come to LBI.

Comment Number: BOEM-2024-0008-1106-0056
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

- Impacts to NOAA scientific surveys including 1) inability to safely navigate and deploy mobile survey gear which leads to 2) exclusion of NMFS sampling platforms from the wind development area, 3) impacts on the random-stratified statistical design that is the basis for data analysis and use in scientific assessments, advice, and analyses; 4) the alteration of benthic, pelagic, and airspace habitats in and around the wind energy development area; and 5) potential reductions in sampling outside wind areas caused by increased transit time by NOAA vessels. Text provided in documents prepared for other projects with similar impacts can be used to inform the assessment of scientific survey impacts;

Comment Number: BOEM-2024-0008-1106-0062
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

Direct impacts to the habitats, protected resources, and fisheries present or operating in the Project area should not be diluted or dismissed by stating the Project area is small or insignificant in comparison to a large Geographic Analysis Area.

Comment Number: BOEM-2024-0008-1106-0063
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

All conclusions related to the level of the Project's impacts should be fully supported by the analysis and consistent with impact definitions identified in the EIS.

Comment Number: BOEM-2024-0008-1106-0064
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

If determinations are based on the inclusion of mitigation measures, those measures must be clearly defined and indicate whether the measure is considered part of the project proponent's proposed action, ones that BOEM will require upon COP approval, or if that measure is an option that may be implemented by the developer at their own discretion.

Comment Number: BOEM-2024-0008-1106-0066
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

Using Best Available Science
Using the best scientific information available is critical to analyzing the impacts on marine resources.

Data used should include a sufficient range of years to reflect natural variability in resource conditions, including current conditions. We recommend that fisheries and marine resource survey analyses consider at least 10 years of data up to and including data within the past two years. This is especially important for marine mammals given recent distribution and habitat utilization shifts.

Comment Number: BOEM-2024-0008-1108-0018
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

Discharge Permits
- It is EPA's understanding that construction and operation activities may result in discharges requiring National Pollutant Discharge Elimination System (NPDES) authorization. The EIS should provide information on these potential discharges of pollutants to waters of the United States (US).

A.3.19 Other Topics Not Listed

Comments associated with this issue appear in the sub-issues below.

A.3.19.1. Coastal Zone Consistency

Comment Number: BOEM-2024-0008-0611-0038
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

In the COP, Atlantic Shores North is not volunteering to comply with the detailed CZMA requirements. It is only admitting that the export cable runs that go into state waters are subject to the CZMA requirements. As we understand the law, the BOEM, the State of New Jersey, and the project are responsible for complying with the full consistency provisions of the CZMA regardless of whether the project facilities in question are in state or federal waters. The draft EIS should confirm and clarify this.

Comment Number: BOEM-2024-0008-1040-0019
Commenter Type: Individual
Commenter: Denise Boccia

Comment Excerpt Text:

Has NJ DEP officially requested of BOEM that it comply with the New Jersey CZMA requirements?

Comment Number: BOEM-2024-0008-1040-0004
Commenter Type: Individual
Commenter: Denise Boccia

Comment Excerpt Text:

Does BOEM agree that it must comply with New Jersey detailed CZMA requirements?

Comment Number: BOEM-2024-0008-1053-0001
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc and Downbeach

Comment Excerpt Text:

In 2004, the Governor, by Executive Order, authorized the NJ STATE BLUE RIBBON PANEL on offshore wind based on the Coastal Zone Management Act because the projects were in NJ's coastal zone and "there is a reasonably foreseeable effect on uses and resources of NJ's coastal zone" The Blue Ribbon Panel report was released in 2006 and guiding principles based on the Coastal Zone Management Act were presented.

The wind developers who purchased the leases, including Atlantic Shores North (Shell Oil and EDF Renewables), were well aware of the CZMA, the fact that the lease areas were selected based on the Blue Ribbon Panel report and that the project's viability would be based on its adherence to the CZMA regulations. In fact, the information on the Blue Ribbon Panel is included in the Atlantic Shores South COP Document in section 1.3.1., BOEM's New Jersey Offshore Wind Leasing Program. Projects in the lease areas which were determined by the process starting with the Blue Ribbon Panel Report must continue to be examined and evaluated using the same criteria. Changing or ignoring the criteria would clearly demonstrate at best the wind developer's dishonesty, lack of integrity and manipulation of the process and at worst fraudulent and illegal actions.

A.3.19.2. Offshore Noise

Comment Number: BOEM-2024-0008-0004-0008
Commenter Type: Individual
Commenter: Noel Quinn

Comment Excerpt Text:

Turbines blades produce noise/noise pollution. The sound levels from pile-driving, when turbine is hammered into seabed, are particularly high. This maybe potentially harmful to marine species.

Comment Number: BOEM-2024-0008-0006-0002
Commenter Type: Individual
Commenter: Donna Piraino

Comment Excerpt Text:

And how can anyone possibly know what the long term effects will be? Sharks navigate with electric sensors. How will it effect their survival? Whales and dolphin use echolocation. The constant pounding of seismic waves surely must interfere!

Comment Number: BOEM-2024-0008-0022-0001
Commenter Type: Individual
Commenter: Nancy Robbins

Comment Excerpt Text:

Each wind turbine is driven 242 ft deep into the seabed with pounding hammer strokes at 4400 kJ. These giant turbines generate continuous vibrations transmitted into the ocean floor for 20 year life. Saving the

planet does not mean destroying the ocean and the life it contains.

Comment Number: BOEM-2024-0008-0080-0001
Commenter Type: Individual
Commenter: Kathryn Nguyen

Comment Excerpt Text:

There are valid concerns about wind energy in the oceans. Firstly, this has been moved to the oceans, because all people on land cannot tolerate the incessant noise, vibrations, installation stress, dissipating particulates and other noxious effects of wind farms.

The aquatic world does not have a voice, and we must speak for it.

The sound from installation of these windmills deafens aquatic life. Hearing is a critical sensory organ for marine life. A deaf marine mammal will soon be a dead marine mammal.

The vibrations from these monstrosities throughout the aquatic domain adds intolerable stress to aquatic organisms.

Comment Number: BOEM-2024-0008-0147-0001
Commenter Type: Individual
Commenter: Regina Littwin

Comment Excerpt Text:

It's a proven fact that offshore wind is harming the marine ecosystem and its inhabitants through noise pollution.

Comment Number: BOEM-2024-0008-0148-0001
Commenter Type: Individual
Commenter: Tom Littwin

Comment Excerpt Text:

It's a proven fact that offshore wind is harming the marine ecosystem and its inhabitants through noise pollution. To date, no full necropsies have been released for whales stranded in NY/NJ waters dating back to Dec. 2022. As such "cause of death" has yet to be determined. Why not? No projects should be allowed to move forward or granted until studies have been completed.

Comment Number: BOEM-2024-0008-0453-0002
Commenter Type: Individual
Commenter: Jody Bielski

Comment Excerpt Text:

Just like this spend trillions to find that these consent vibrations and noise will kill what is left of our whales. It's bad enough he's doing this to people. But whales, dolphins & sharks.

Comment Number: BOEM-2024-0008-0456-0003
Commenter Type: Individual
Commenter: Regina Alfonso

Comment Excerpt Text:

Also, homeowners will be able to hear the noise and feel the vibrations which negatively affects people's heath. Do the research and stop rushing this.

Comment Number: BOEM-2024-0008-0550-0001
Commenter Type: Individual
Commenter: AJ Conte

Comment Excerpt Text:

The noise, disruption, and potential pollution from the project could endanger marine habitats, particularly affecting critically endangered species by disrupting their migration patterns and degrading their habitats.

Comment Number: BOEM-2024-0008-0569-0006
Commenter Type: Individual
Commenter: Craig Osten

Comment Excerpt Text:

What about the impact the turbines from a Sound and light perspective for both animals, and humans that are onshore.

Comment Number: BOEM-2024-0008-0573-0001
Commenter Type: Individual
Commenter: Susan Stinson

Comment Excerpt Text:

As a New Jersey resident I have several rather large concerns with this entire project. Environmental issues relating to the sea creatures that have generally flourished in the past 20 so years. We are going into their habitat, pounding away, creating high decibel sounds that carry through water. Our sea creatures count on a sensitive hearing mechanism to navigate while avoiding obstacles- harming this guiding mechanism we will be doing irreversible harm to entire populations. Even humans have negative affects to high decibel noise- even my Apple watch tells me to avoid 30 minutes of 90dB sound.

Comment Number: BOEM-2024-0008-0611-0020
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

Vessel Survey Noise Impact. The EIS needs to provide an independent transparent quantitative analysis of vessel survey noise and its impact on marine mammals. Current effects are significantly underestimated. For example, the noise source levels for the sparker units are underestimated by about 8 decibels(dB). The noise transmission loss is overestimated by 5 dB. Additionally, the cumulative impact of multiple vessel surveys being conducted in the same area at the same time needs to be assessed.

Comment Number: BOEM-2024-0008-0611-0021
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

Operational Turbine Noise. The EIS needs to address the issue of operational turbine noise from the large turbines here quantitatively and professionally. It should provide a numerical estimate of the operational noise source level based on the measured noise level versus power trends from prior measurement studies. Based on those Save LBI estimated and provided a level of 181 decibels (dB) in our prior comments. With that, the resulting noise field from the full wind complex to get down to the whale disturbance criteria of 120 dB extends miles from the wind complex. When that is looked at cumulatively across all the projects in the New York/New Jersey area it could essentially block whale migration.

With regard to the North Atlantic right whale, this is obviously a very serious problem in terms of compliance with the Endangered Species Act (ESA) and the Marine Mammal Protection Act, and is therefore essential information to reach a reasoned decision. With regard to the humpback whale and perhaps others an impact of this magnitude could bear on its endangered species status, and whether a consultation under the ESA is required. The BOEM needs to stop making excuses about uncertainty in this prediction (which has been quantified in Save LBI's comments and is acceptable) to avoid analyzing this problem, especially given the much larger uncertainties present in many of its other happier conclusions.

Comment Number: BOEM-2024-0008-0611-0025
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

The EIS needs to provide a transparent quantitative analysis of pile driving noise and its impact on marine mammals done by a contractor independent of the. company, and reporting directly to the BOEM. It cannot rely on the noise exposure modeling reports being done by companies reporting to Atlantic Shores because those reports are significantly underestimating impact, and do not disclose or explain their underlying equations, input factors, or other key assumptions to allow for a comparison with mainstream mathematical and scientific practice.

Comment Number: BOEM-2024-0008-0611-0026
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

Calculations by Save LBI of such impacts based on prior studies and measurements point towards gross underestimates in the modeled results of both Level A (serious harm and fatality) and Level B (behavior disturbances). For example, bubble curtain systems will not attenuate the noise for the low frequencies being emitted so the 10 dB source attenuation assumed is not valid. The time to drive one foundation is closer to two days rather than one day, so to maintain annual schedules, the number of pile driving days in December when the NARW is still migrating will be significantly greater than stated. The modeled noise energy transmission losses per decade increase in distance are 15 dB higher than justified by physical science and prior measurements. The Wood et.al. probabilistic disturbance criteria should be used, and properly calculated, which would increase level B takes five-fold as compared to the single 160 dB unsupported NMFS criteria. The use of a longer than justified averaging time decreases root mean

squared levels by about 6 dB. The right whale densities in the project area being used now are 1/10 of what was used in the project's ITA application and recommended in the new Duke University modeling Report.

Comment Number: BOEM-2024-0008-0645-0004
Commenter Type: Individual
Commenter: Patrice Tullai

Comment Excerpt Text:

Noise pollution can cause harm to whales directly by damaging their hearing and cause internal bleeding and death. Many marine life have what is called a swim bladder which is highly sensitive to acoustics. This swim bladder adjusts the creatures level of buoyancy and determines whether it floats or sinks. More commonly excessive or prolonged noise can cause behavioral changes that interfere with the health and survival of the animals. The noise of the turbine is high and noise propagates over water. The wind turbine noise can and will be heard onshore.

Comment Number: BOEM-2024-0008-0651-0003
Commenter Type: Individual
Commenter: Elizabeth Quattrochi

Comment Excerpt Text:

Worse, these machines introduce a new deadly pollutant, acoustic sound.

NOAA's analysis outlines the many threats to the ecosystem in a 300+ page report, concluding more study is needed to better understand the impacts OSW development will have on the marine ecosystem. [Footnote 1: https://repository.library.noaa.gov/view/noaa/49151] It humbly acknowledges all that is **not known** about Habitat Modification due to construction and operation noise and vibration, electromagnetic fields (EMF), and thermal radiation from cables, as well as secondary gear entanglement (pg 16). A lot can go wrong here!

The effects on Phytoplankton and Zooplankton are particularly troubling because of the interdependency between whales and plankton everything from top to bottom of the food chain, "OSW structures modify oceanic response, which may have significant effects on fundamental ecosystem processes. Disruptions in connectivity may pose a risk to certain subpopulations with planktonic larvae" [pg 18]

Despite these warnings, NOAA proceeds to authorize permits to harass and kill whales

What kind of gamble is this, when permits are based on assumptions and methodology that are wrong?

Comment Number: BOEM-2024-0008-0761-0008
Commenter Type: Individual
Commenter: John Deputato

Comment Excerpt Text:

Have these size turbines actually been tested or proven in full operation for any length of time? What type of acoustics will they produce both under and on top of the ocean. Can they be heard from shore?

Comment Number: BOEM-2024-0008-0789-0002
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

The dramatic increase in OSW vessels performing incredibly disruptive sonar mapping, pile driving and construction activities over the same amount of time is NOT a coincidence. I have information from a diver hired by said companies that dead whales in the ocean in these areas are dragged out to sea as far as possible and rarely reported. These companies are FULLY aware their activities SEVERELY harm whales, dolphins, and other sea life. This diver will not be working for these companies again, despite being paid very well, out of pure disgust. It is not new information that whales and dolphins communicate through sound emanating underwater. It is of course known that sonar - and any heavy noise - disrupts their communications, hurts their hearing, augments their balance - all of which have serious negative effects on them. This is common sense to anyone who has the most basic understanding of these amazing creatures. It is also OBVIOUS to anyone who has lived on the East Coast for more than 5 years that the number of whale and dolphin deaths and strandings are NOT NORMAL IN ANY WAY. The "studies" carried out by OSW companies and partnered government agencies, schools, non-profits (Mystic Aquarium, ie) and so on are HIGHLY FLAWED AND SKEWED. Obviously any organization getting any compensation from OSW companies should never be cited as credible sources. Another easily verifiable fact is the same organizations getting "donations" are putting out these studies. It is even more egregious to accept anything put out by OSW companies themselves. It goes without saying their reports would not be objective. This is not news to anyone with an ounce of common sense. What it will take for legislative bodies to accept this is an abject FAILURE and more HARMFUL than good ? How many 30 ton pound majestic creatures need to be washed up on shore bleeding out of their ears ? All elected officials supporting this work need to be voted out. That time cannot come soon enough.

Comment Number: BOEM-2024-0008-0800-0004
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

4. Studies have shown that exposure to excess noise is harmful to all animals, including humans. Sound along the shore travels very easily since their are no barriers to block sound waves. Since the project will be close to the shore, many residents as well as wildlife will be stressed because of this. How will this be remedied?

Comment Number: BOEM-2024-0008-0821-0003
Commenter Type: Individual
Commenter: Sue Liebross

Comment Excerpt Text:

If there are vessel strikes I would imagine it would have happened after the disorientation from the sonar blasts and pile driving.

Comment Number: BOEM-2024-0008-0836-0001
Commenter Type: Individual
Commenter: ElizabLiz McManamy

Comment Excerpt Text:

Scientists agree, and a body of research confirms, that the intense sound produced by these noise sources can induce adverse effects in marine mammals. These effects include death and serious injury caused by brain hemorrhages or other tissue trauma; strandings and beachings; temporary and permanent hearing loss or impairment; displacement from preferred habitat and disruption of feeding, breeding, nursing, communication, sensing, and other behaviors vital to the survival of these species.

High-intensity sound has been shown to have adverse impacts on other marine species as well. Scientific studies have demonstrated that airguns have the potential to injure and significantly reduce catch rates of certain fish species at substantial distances. The proliferation of intense underwater noise poses a threat to already depleted fish stocks throughout the world's oceans.

As stated most recently by the Cetacean Specialist Group of the IUCN-World Conservation Union: "Military operations involving the use of high-intensity sonar, explosive devices, and other intense noise sources pose both lethal and sub-lethal threats to cetaceans." THIS INClUDES OSW Turbine drilling, which exceeds 130 decibels (louder than a close up rock concert).

Researchers found that mid-frequency sound caused some whales to stop eating krill for up to an hour; other blue whales increased their swimming speed and swam away from the source of the noise.

Comment Number: BOEM-2024-0008-0859-0002
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

They are extremely loud

Comment Number: BOEM-2024-0008-0859-0004
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

and are responsible for killing our precious whales and dolphins. How do you explain this to our next generations? How does your heart not break at the sight of these whales dieing and believe it has nothing to do with the loud noise under water?
This must stop

Comment Number: BOEM-2024-0008-0865-0001
Commenter Type: Individual
Commenter: John Munks

Comment Excerpt Text:

We know, regardless of stats, that the marine population will be severely impacted by construction of wind turbines and the vibrations they create. You see evidence of this now, but you are ignoring it for monetary profit. Your children will have no fish.

Comment Number: BOEM-2024-0008-0962-0003
Commenter Type: Individual
Commenter: Barbara Sommer

Comment Excerpt Text:

The noise and physical disturbance could disrupt the habitats of fish, whales, dolphins and other marine animals, while the risk of collisions with sea birds and bats would devastate local bird populations. Have these potential consequences been fully evaluated?

Comment Number: BOEM-2024-0008-0964-0005
Commenter Type: Individual
Commenter: Sally Barbato

Comment Excerpt Text:

TTS is a relatively short-term, reversible loss of hearing following noise exposure
-PTS is an irreversible loss of hearing (permanent damage)

Permanent and short term damage to marine life from noise is unacceptable. We have been witnessing the results from noise damage for months due to the surveying on the eastern seaboard.

Comment Number: BOEM-2024-0008-0974-0002
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

Offshore wind farm construction generates significant underwater noise from activities like pile driving, dredging, and increased vessel traffic. This noise can disturb marine mammals like whales and dolphins, interfering with their communication, navigation, and feeding behaviors. Operational noise from the turbines themselves can also impact marine life.

Comment Number: BOEM-2024-0008-0996-0004
Commenter Type: Individual
Commenter: Apostolos Gerasoulis

Comment Excerpt Text:

Given these findings, it is evident that the increase in whale deaths is not a random occurrence, prompting a need for investigation into potential causes. Although the National Oceanic and Atmospheric Administration (NOAA) has mentioned ocean noise pollution as a possible contributing factor in their Unusual Mortality Event (UME) announcement, both NOAA and the Bureau of Ocean Energy Management (BOEM) remain cautious, stating that there is no definitive proof that noise pollution is the primary cause. They have yet to provide substantial justification for this stance.

Comment Number: BOEM-2024-0008-1039-0001
Commenter Type: Individual
Commenter: AARON DURAN

Comment Excerpt Text:

Even NOAA says the ocean noise is harmful to marine animals.
https://www.fisheries.noaa.gov/national/science-data/ocean-noise

But why are they now saying that the offshore wind farms doesn't effect marine animals.
https://www.fisheries.noaa.gov/new-england-mid-atlantic/marine-life-distress/frequent-questions-offshore-wind-and-whales

So all the sonar and suvaying of the ocean floor isn't increasing the amount of ocean noise?

Comment Number: BOEM-2024-0008-1040-0012
Commenter Type: Individual
Commenter: Denise Boccia

Comment Excerpt Text:

Will the EIS contain an airborne noise assessment of the noise received at the shore from pile driving and turbine operation?

Comment Number: BOEM-2024-0008-1040-0018
Commenter Type: Individual
Commenter: Denise Boccia

Comment Excerpt Text:

Regarding low frequency baleen whales, can noise from pile driving be effectively reduced by surrounding the pile with a sound shield in the water? If so, please explain.

Comment Number: BOEM-2024-0008-1070-0112
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Impacts from Underwater Noise

With their fine-tuned hearing abilities, anthropogenic noises generated by shipping, sonars, pile drivers, and air guns are known as a major disturbance to marine mammals. Compared to extensive studies on cetaceans and pinnipeds, however, acoustic disturbance on diving marine birds has received very little research focus. As recently as the last decade, hearing abilities had been properly measured in only ~50 of the world's 10,000 species of extant birds. [Footnote 54: Dooling R. 2002. Avian hearing and the avoidance of wind turbines. NREL/TP-500-30844. National Renewable Energy Lab, Golden, CO https://www.nrel.gov/docs/fy02osti/30844.pdf.] Yet approximately 150 species of amphibious birds found in seven taxonomic orders are pursuit-diving foragers, that is, species diving from the water surface to capture prey underwater at depths ranging from a few meters to well more than 100 m. [Footnote 55: Piatt JF, Nettleship DN. 1985. Diving depths of four alcids. The Auk 102:293-297; Sato K, Naito Y, Kato A, Niizuma Y, Watanuki Y, Charrassin JB, Bost CA, Handrich Y, Le Maho Y. 2002. Buoyancy and maximal diving depth in penguins: do they control inhaling air volume? Journal of Experimental Biology.

205:1,1891,197; Waggitt JJ, Cazenave PW, Torres R, Williamson BJ, Scott BE. 2016. Quantifying pursuit-diving seabirds' associations with fine-scale physical features in tidal stream environments. Journal of Applied Ecology 53:1,6531,666.] Similar to dolphins, sea birds possess auditory structures and soft tissue mechanisms that function as low impedance channels for conducting underwater sound. [Footnote 56: Ketten DR, Merigo C, Chiddick E, Krum H, Melvin EF. 1999. Acoustic fatheads: parallel evolution of underwater sound reception mechanisms in dolphins, turtles, and sea birds. Journal of the Acoustical Society of America 105:1110 https://doi.org/10.1121/1.425191.]

Underwater hearing abilities for some diving bird taxa have been found to be more sensitive than expected, with hearing thresholds in the frequency band 14 kHz comparable to those measured in seals and toothed whales. [Footnote 57: Hansen KA, Maxwell A, Siebert U, Larsen ON, Wahlberg M. 2017. Great cormorants (Phalacrocorax carbo) can detect auditory cues while diving.
Science of Nature 104:17.] Evaluated in units of sound intensity, hearing sensitivity in one diving bird (Great Cormorant Phalacrocorax carbo sinensis) was higher in underwater environments than in air. [Footnote 58: Johansen S, Larsen ON, Christensen-Dalsgaard J, Seidelin L, Huulvej T, Jensen K, Lunneryd SG, Bostrm M, Wahlberg M. 2016. In-air and underwater hearing in the great cormorant (Phalacrocorax carbo sinensis). Pp. 505512 in The Effects of Noise on Aquatic Life II. Springer, New York, NY; Larsen ON, Wahlberg M, Christensen-Dalsgaard J. 2020. Amphibious hearing in a diving bird, the great cormorant (Phalacrocorax carbo sinensis). Journal of Experimental Biology 223:jeb217265 https://doi.org/10.1242/jeb.217265.] Similar enclosure studies using underwater broadband sound bursts and mid-frequency sonar signals triggered consistent (and graded) reactions in Common Murres to underwater sound pressure levels that ranged from 110 to 137 dB re 1 ?Pa. [Footnote 59: Anderson et al. 2020.] Underwater noise bursts aimed at Gentoo Penguins (Pygoscelis papua) at sound pressure levels between 100 and 120 dB re 1 ?Pa RMS led to graded behavioral responses that were directed away from the sound source, ranging from no reactions at 100 dB to strong reactions in more than 60% of the playbacks at 120 dB re 1 ?Pa. [Footnote 60: Srensen K, Neumann C, Dhne M, Hansen KA, Wahlberg M. 2020. Gentoo penguins (Pygoscelis papua) react to underwater sounds. Royal Society Open Science 7:191988 https://doi.org/10.1098/rsos.191988.]

Comment Number: BOEM-2024-0008-1070-0113
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Until further study reveals all impacts of underwater sound propagation on diving birds, we urge a precautionary stance wherein the working assumption is that these marine vertebrates are susceptible to auditory disturbance like sea turtles and marine mammals. [Footnote 63: Ketten et al.] Sound characteristics and qualities other than noise amplitude alone [Footnote 64: Guan S, Brookens T, Miner R. 2022. Kurtosis analysis of sounds from down-the-hole pile installation and the implications for marine mammal auditory impairment. JASA Express Letters 2:071201.] may be found to influence diving birds. Exposure analyses will require BOEM and other regulatory agencies to stay current with the best available science in the acoustic disciplines, including key measurements for detecting auditory thresholds for the anatomical, behavioral, and acclimated responses of diving marine birds to acoustic disturbances. Given that diving birds have already been shown to displace 1000's of meters away from seismic noise, [Footnote 65: Pichegru et al.] the add-on effects of spatial displacement must also be factored comprehensively into impact assessments (both project and cumulative).

North American diving birds subject to acoustic disturbances associated with OWED construction and operations include sea ducks (Anseriformes: 21 species), grebes (Podicipediformes: 7 species), alcids (Charadriiformes: 22 species), loons (Gaviiformes: 5 species), and cormorants (Suliformes: 6 species). Additional bird species in the orders Charadriiformes (terns), Phaethontiforms (tropicbirds),

Procellariiformes (shearwaters, petrels), Suliformes (gannets, boobies), and Pelecaniformes (Brown Pelicans) spend brief times underwater during bouts of plunge diving. Diving marine birds are most vulnerable to impacts from underwater acoustic disturbance in the Atlantic and Pacific OCS regions, especially during winter months when both more species and higher numbers of divers are present in these offshore waters. Conversely, the Gulf of Mexico OCS region has substantially fewer species and numbers of diving birds that might be vulnerable to such acoustic impacts.

When harmful acoustic disturbance to diving birds arises from offshore wind energy operations or construction, [Footnote 66: If birds are no more sensitive to acoustic disturbance than marine mammals, a plausible assumption is that noise impacts from wind farms are more severe during construction than during operation. See: Madsen PT, Wahlberg M, Tougaard J, Lucke K, Tyack AP. 2016. Wind turbine underwater noise and marine mammals: implications of current knowledge and data needs. Marine Ecology Progress Series 309:279295.] minimization activities may be justified to curtail such harms. Densities of diving marine birds are typically highest during winter months on inner and middle shelf habitats, [Footnote 67: E.g., see Figure 42, p. 39 in: Robinson Willmott J, Forcey G, Vukovich M, McGovern S, Clerc J, Carter J. 2020. Ecological Baseline Studies of the US Outer Continental Shelf: Final Report. Gainesville, FL. OCS Study BOEM 2021079.] at least in the Atlantic and Gulf OCS regions. Consequently, merely shifting the construction season(s) used for pile-driving and other noisy activities may greatly reduce any acoustic disturbance to such diving birds. If this duration of time/area closure is not practical, then other methods for sound abatement may be used. These methods include: (1) establishing safety zones monitored by visual observers or passive acoustics, and that trigger shut-down or low-power operations if large diving bird flocks enter these zones, (2) using noise reduction gear like bubble curtains around pile driving, and (3) deploying other noise-source modifications or changes to operational parameters such as soft starts. [Footnote 68: Erbe C, Dunlop R, Dolman S. 2018. Effects of noise on marine mammals. Pp. 277309 in Effects of anthropogenic noise on animals. Springer, New York, NY.]

Comment Number: BOEM-2024-0008-1088-0002
Commenter Type: Individual
Commenter: Mary O'Keeffe

Comment Excerpt Text:

There are various concerns that I have but one that comes to the forefront for me are the Low-Frequency Wind Turbine Noise & Vibrations that can cause harm to sea life and even death to some.

Comment Number: BOEM-2024-0008-1095-0001
Commenter Type: Individual
Commenter: Michael Mason

Comment Excerpt Text:

The windmills haven't even been constructed yet and there are whale deaths weekly if not daily. The sonar is affecting the frequencies/natural directions etc., the whales, dolphins, sharks use to navigate. We haven't had this many deaths ever since the start of the sonar surveys. The windmills are not only ugly but them being built will cause more deaths. Birds, other sea life.

Comment Number: BOEM-2024-0008-1106-0037
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

- Impacts of elevated noise during geophysical and geotechnical surveys, pile driving, UXO/MEC detonation, wind turbine operations, decommissioning, and other activities throughout all Project phases;

Comment Number: BOEM-2024-0008-1110-0001
Commenter Type: Local Government
Organization: Berkeley Township

Comment Excerpt Text:

On average land-based turbines produce sounds in the range of 35-45db when heard three hundred meters away. [Department of Energy-htttps://windexchange energy.gov project sound]. Sound in a water medium travels greater distance and is magnified, a fact having impacting and collateral impact on sea life, see "New Jersey's $8 Billion Fishing Industry among the Top in Nation, supports 52,000 Jobs" [SEE ATTACHMENT 2]. Also see Military Sonar Kill Marine Wildlife" [SEE ATTACHMENT 3]. I suggest a thorough review and interaction and impact of "Sona Boyes" used to detect submarines and other underwater structures and the collateral impact on "sea life."

Comment Number: BOEM-2024-0008-1110-0005
Commenter Type: Local Government
Organization: Berkeley Township

Comment Excerpt Text:

Addressing the noise effect on carbon-based life there are studies of denial and support. NOAA addressing offshore wind development concluded "there are no known links between large whale deaths and ongoing offshore wind activities" [SEE ATTACHMENT 6]. The Journal of Neurophysiology article "Evidence for The Initiation of Decompression Sickness by Exposure to Increased Underwater Sound" concluded "Underwater sound transmission with frequency and intensity characteristics similar to those of active naval sonars and diving navigations systems may induce neurological damage during immersion and facilitate overt DCS. Our results indicate a deleterious interaction between intense underwater sound fields and the vital body systems of a small terrestrial mammal, either directly or via inert gas bubble growth. This may contribute to our understanding of the mass stranding of cetaceans, purportedly associated with the deployment of naval sonar, and may also have potential implications for human diving safety" [SEE ATTACHMENT 7].

Comment Number: BOEM-2024-0008-1166-0005
Commenter Type: Individual
Commenter: Nancy Donovan

Comment Excerpt Text:

I'm afraid the noise from the turbines, especially when they're being built, anything afterward and the noise that will just come from them will have a terrible effect on marine life.

A.3.19.3. Electromagnetic Fields (EMF)

Comment Number: BOEM-2024-0008-0611-0037
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

The EIS needs to include a quantitative analysis of the electromagnetic(EMF) fields levels emanating from cables, and what impact those levels will have impact on marine mammals and fish.

Comment Number: BOEM-2024-0008-0633-0020
Commenter Type: Federal Agency
Organization: Mid-Atlantic Fishery Management Council and New England Fishery Management Council

Comment Excerpt Text:

The EIS should describe the extent to which EMF may impact marine species, including the differences between different types of cables and how they would be installed for this project.

Comment Number: BOEM-2024-0008-0900-0002
Commenter Type: Individual
Commenter: Roslyn McGivney

Comment Excerpt Text:

Additionally, when power lines are embedded in the ocean
floor for tens of thousands of miles, to connect the power grid, it will churn up the natural sand containing its own inhabitants. EMFs emitted have been scientifically proven to interrupt flounder, eel and other species from crossing in their natural habitat.

Comment Number: BOEM-2024-0008-0964-0009
Commenter Type: Individual
Commenter: Sally Barbato

Comment Excerpt Text:

Lastly, there are radar and safety concerns highlighted by military officials. Radar interference and navigational interference. There are national security issues that go hand and hand with this.

Comment Number: BOEM-2024-0008-0974-0003
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

The cables transmitting electricity from offshore wind farms produce electromagnetic fields that some studies suggest may affect the orientation and migration patterns of certain marine species like sharks, rays, and some fish.

Comment Number: BOEM-2024-0008-1007-0013
Commenter Type: State Government
Organization: New York State

Comment Excerpt Text:

d. Maintain cables in a bundled state or, if unbundling is necessary, to bury in a single trench to further reduce electromagnetic fields (EMF) and habitat impacts.

Comment Number: BOEM-2024-0008-1007-0018
Commenter Type: State Government
Organization: New York State

Comment Excerpt Text:

b. Potential behavioral and physiological impacts to marine life and ecosystems from construction and operation activities. There are significant knowledge gaps regarding effects of EMF on most invertebrates, and Mid-Atlantic fish species. The Agencies recommend that the EMF and cable heat analysis should primarily evaluate dipole, bundled high voltage direct current (HVDC) export cables as these will be required for most export cables entering NYS due to the distance required to reach shore and state policy initiatives (e.g., mesh-ready).

Comment Number: BOEM-2024-0008-1008-0003
Commenter Type: Individual
Commenter: John Casagrande

Comment Excerpt Text:

Limited studies of existing deployments show that certain forage species and pelagic species avoid the wind deployments altogether, possibly due to magnetic fields.

Comment Number: BOEM-2024-0008-1029-0004
Commenter Type: Individual
Commenter: Douglas Crawford

Comment Excerpt Text:

Damage to the shoreline: Our fishermen are aware of catastrophic losses of sea scallop populations in the vicinity of sonar work. It has killed them. This outcome is unacceptable, and BOEM has allowed it to happen. We cannot simply accept at face value that you are operating truthfully about the effects of sonar on marine mammals. The increase in ocean mammal deaths is now commonly understood to result from the aftermath of exposure to sonar and other sonic surveying. Expect that the assertion that "there is no evidence that sonar is killing the whales and dolphins" (much like the tobacco industry's "there's no evidence that cigarette smoking causes cancer") will have to pivot to proving to the public that the dead mammals found have no issues in their navigational tissues. Further evidence is emerging every week, with more compelling correlations between whale deaths and recent sonar boat activity. If the evidence mounts sufficiently to sway a (fair) court of law, you might expect to be instructed to rescind your take authorizations, and the ability to grant any further ones will end.

Comment Number: BOEM-2024-0008-1092-0002
Commenter Type: Individual
Commenter: Sharon GARRY

Comment Excerpt Text:

The EMFs from such a massive transmission line have not been studied as to their effects on birds, marine or human mammals.

Comment Number: BOEM-2024-0008-1100-0001
Commenter Type: Individual
Commenter: Erica Librizzi

Comment Excerpt Text:

We are aware of the importance and the dependence of sonar to dozens of cetaceans for them to continue with their ancient way of life. Communications, migrations, reproductions, hunting, and their spacial perception.

Comment Number: BOEM-2024-0008-1106-0043
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

- Effects from electromagnetic fields (EMF) and heat from inter-array and export cables on fish and marine mammals (e.g., ability to forage, attraction, etc.);

Comment Number: BOEM-2024-0008-1111-0018
Commenter Type: Advocacy Group
Commenter: Jack Fullmer
Organization: New Jersey Council of Divers and Clubs

Comment Excerpt Text:

Finally, a safety issue that came up regarded survey activity by vessels doing powerful survey work for wind farm development. In 2015 we were warned by Lamont Labs (Columbia University) that divers should stay at least 3.2 miles from survey vessels pulling powerful sonar arrays or acoustic bottom survey work. Apparently hemorrhaging could occur if close to a dive boat with divers in the water.

A.3.20 Planned Activities Scenario/Cumulative Impacts

Comment Number: BOEM-2024-0008-0138-0003
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

The project impacts in the COP dwarf the true impact to Brigantine, Atlantic City and surrounding communities for the reason that these communities will be surrounded by other projects that are adjacent to each other including Atlantic Shores South, Atlantic Shores North, Ocean Wind 1 and Ocean Wind 2. The impact of these combined projects, including 550 wind turbines with a height of up to 1040 feet, with

three of the projects starting less than 9 miles off the coast is unprecedented and not considered in the COP other than in the discussions of a general overall cumulative impact. The combined impact of these specific projects should be examined in rigorous detail and conclusions should be presented to the communities of South Jersey.

Comment Number: BOEM-2024-0008-0138-0007
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

The COP fails to demonstrate that the project will not result in a combined effect of visible and rotating turbines, audible noise, reduced breeze, and higher air temperature on the shore experience and economy, which will have a major impact to the cumulative shore experience.

Comment Number: BOEM-2024-0008-0551-0016
Commenter Type: Advocacy Group
Organization: RODA

Comment Excerpt Text:

RODA, other fishing industry representatives, marine scientists, fishery management councils, the environmental community, and others have consistently requested BOEM take a cumulative approach to offshore wind leasing. BOEM is doing the public and the environment a disservice by failing to adequately assess the cumulative impacts from large scale build out along the entire coast.

Cumulative impacts need to be thoroughly evaluated to consider the changes in fishing activity that will be forced on the industry. The alteration of benthic habitat, predator/prey interactions, increased pressure and conflicts from recreational users, relocation of the fishing activity to other productive areas will realize an increase in gear loss due to strike from shipping traffic from the concentration of vessel traffic and the cumulative effects of increased effort.

The expected impacts under NEPA review should include any cumulative measures, such as species that will interact with various build outs along the eastern seaboard due to migration patterns, vessel traffic and navigation considerations along the coast, long-standing scientific surveys and environmental monitoring, and job opportunitiesboth potentially lost employment in one industry and limitations of permanent jobs in another.

It is difficult to imagine that it would not also benefit developers, transmission interests, and the public for BOEM to clarify its approach to cumulative effects review and at a minimum implement regional planning processes as robust as those it employs for oil and gas leasing. Solely "fast tracking" the large number of projects based on existing (arbitrary) OSW energy production targets may leave us with no recourse to reverse any biological or ecological impacts and a hollow offshore construction industry without longevity.

Comment Number: BOEM-2024-0008-0551-0007
Commenter Type: Advocacy Group
Organization: RODA

Comment Excerpt Text:

BOEM and OSW developers provide inconsistent approaches to whether projects should be considered

on an individual or cumulative level, seemingly based on whichever is more beneficial for the developer and the issue in question. It is unclear how BOEM decides when an EIS is to be conducted for a project. For several of the earliest projects (Vineyard Wind 1, South Fork, and Ocean Wind 1) BOEM's NEPA review focuses on a single proposed project with a Power Purchase Agreement (PPA) in place and defined the range of alternatives by the terms of the PPA. More recently, BOEM has stated it will prepare an EIS for the Coastal Virginia Offshore Wind- C without the project having a PPA, and it will conduct one analysis for Phase 1 and 2 (both with PPAs) of Empire Wind. For the Sunrise Wind and Vineyard Wind South NOIs, BOEM has combined EISs for one phase with a PPA and a later phase that will, ambiguously, provide some more energy. For Atlantic Shores North there seems to be no PPA in place. There is evidently no standard protocol for when BOEM will conduct a project's EIS, and inconsistency is increased when analyses are conducted piecemeal for each phase versus across an entire lease area. The current approach makes it nearly impossible to conduct any cumulative analysis as there is no appropriate time in the federal process to do so.

Comment Number: BOEM-2024-0008-0611-0040
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

The proposed EIS in the NOI fails to address the cumulative impact of this project and other reasonably foreseeable ones on multiple levels. It does not present: (1) the cumulative impact of all the Atlantic Shores and immediately adjacent Ocean Wind projects, (2) the cumulative impact of vessel surveys and pile driving construction in the NJ/NY Bight lease areas, (3) the cumulative impact of all vessel surveys and offshore project construction being authorized by the National Marine Fishery Service(NMFS), (4) the cumulative impact of operational turbine noise in the NJ and the NY Bight lease areas on whale migration, commercial and military vessel traffic and other factors, and (5) the cumulative impact from wind energy project development along the East coast from any factors that have additive risk there, such as the impact of project noise on the right whale and other marine mammal migratory routes, commercial and military vessel collision risk, fishing and tourism impact, the impact on the ecologically sensitive "cold pool" and others.

Comment Number: BOEM-2024-0008-0611-0041
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

The BOEM has improperly segmented the Atlantic Shores projects from the Ocean Wind projects which are immediately adjacent to it. It has also improperly segmented the Atlantic Shores projects into three projects within the New Jersey lease area and another project by the company, the Atlantic Shores Bight project in the Hudson south area. These projects should have been presented in a single EIS, notwithstanding that they are separated in time by a few years because the BOEM professes to be addressing a 1000-year problem here with climate change. At a minimum. the cumulative impact of these projects should be presented in each of the project EISs.

Comment Number: BOEM-2024-0008-0911-0001
Commenter Type: Advocacy Group
Organization: C.A.P.E.

Comment Excerpt Text:

This project will never provide the energy promised.
See Wind Energ. Sci., 9, 555583, 2024

Seasonal variability of wake impacts on US mid-Atlantic offshore wind plant power production
In a new paper published in the journal Wind Energy Science, a team led by Dave Rosencrans, a doctoral student, and Julie K. Lundquist, a professor in the Department of Atmospheric and Ocean Sciences, estimate that offshore wind turbines in the Atlantic Ocean region, where the US plans to build large wind farms, could take away wind from other turbines nearby, potentially reducing the farms' power output by more than 30%.

Comment Number: BOEM-2024-0008-0928-0008
Commenter Type: State Government
Organization: NJDEP

Comment Excerpt Text:

On the topic of cumulative impacts, there still exists a risk of catastrophic impacts to fisheries as fishing grounds become inaccessible over time, particularly for mobile bottom gear fisheries that have high socio- economic value and are active in multiple lease areas. As MRA has noted on other projects, landings may be a fraction of the value a fishery represents to New Jersey and our ports. Losses incurred by the fishery will also affect supporting industries like processing houses and marinas and impacts to fishery infrastructure could have cascading impacts. One way to mitigate likely impacts is to invest in more economic studies to understand what those impacts might be and how they can be detected, and supporting those fisheries, like surfclam, sea scallop, squid, etc., through fishery enhancement research and programs. The surfclam industry in New Jersey has been highly effective in looking for opportunities for sustainability, but they need support that is not tied to a single project or a single funding agency. The sea scallop industry is highly motivated and informed and can provide options for supporting the sustainability of their fishery. Avoiding fishery losses is preferable to compensating them.

Comment Number: BOEM-2024-0008-0965-0001
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

ALL projects for offshore wind on the East Coast of the USA need to halted immediately. There has not been enough research to see the long term effects on the ocean ecosystem. We have already seen a devastating amount of marine mammals washing up in our shores as well as floating in the Atlantic Ocean. These murders would not be happening if the construction and surveying of the wind turbines in the Atlantic Ocean were not taking place. What about the birds and bats that migrate along the coast? Everyone in the ecosystem works together. WE CANNOT PAVE THE OCEAN WITH CEMENT AND INDUSTRIALIZE IT! This is not how one "Saves the Planet". We cannot destroy the ocean that we ALL need to survive. I am against the industrialization of the ocean. We live and work here. The damage will be irreversible. This needs to stop before it's too late! Save the ocean!!!! Stop offshore wind!!!

Comment Number: BOEM-2024-0008-0969-0004
Commenter Type: Local Government
Organization: Long Beach Township, NJ

Comment Excerpt Text:

In previous Environmental Impact Statements for offshore wind, BOEM refused to adequately address cumulative environmental impacts of the 48 or more proposed windfarms in the Mid-Atlantic, and it must not continue this practice. BOEM must define the scale of its spatial and temporal analysis to prevent it from appearing arbitrary in determining which future projects to include in its cumulative analysis. BOEM's selection must be representative of its permitting schedule and the Administration's offshore wind goals until at least 2030 (or later). The Township requests that BOEM analyze the Atlantic Shores North project together with the complete build-out of proposed offshore wind farms in the northeast region.

Comment Number: BOEM-2024-0008-1004-0002
Commenter Type: Individual
Commenter: Michael Dean

Comment Excerpt Text:

BOEM continues to ignore lawful requirements to conduct cumulative environmental impact analyses on the 11 offshore wind lease sites off the coasts of NJ and NY, where projects currently are proceeding through various stages of development.

All activities, including this Intent to Prepare an EIS for AS North, on all projects needs to be halted until a thorough, independent and appropriate CUMULATIVE impact analysis for the New York Bight and near shore leases in the region is undertaken and evaluated.

Comment Number: BOEM-2024-0008-1010-0013
Commenter Type: Local Government
Organization: Cape May County, NJ

Comment Excerpt Text:

BOEM has not provided any cumulative analysis of impacts to benthic resources or habitats, which are at great risk from offshore wind projects. The County request that BOEM provide a Cumulative analysis of impacts to benthic habitats and resources. In addition, impacts from Electromagnetic Fields (EMF) are not well understood, yet the agency very clearly plans to implement the project without consensus on the localized or cumulative impacts of the project. The County urges BOEM to include a cumulative analysis of the potential impacts of EMFs resulting from offshore wind projects.

In addition, the County is concerned about the conversion of soft-bottom habitat to complex structured habitat, which would introduce thousands of acres hard protection around export and inter-array cables. The County requests that BOEM include a cumulative analysis of the impact of conversion of soft-bottom to complex structured habitat.

Comment Number: BOEM-2024-0008-1010-0019
Commenter Type: Local Government
Organization: Cape May County, NJ

Comment Excerpt Text:

A recent study concluded that offshore wind farms are projected to impact primary production and bottom water deoxygenation. The model used in the study projects an increase in sedimented carbon in deeper areas of the southern North Sea due to reduced current velocities and decreased dissolved oxygen inside an area with already low oxygen concentrations. The results provide evidence that cumulative impacts from ongoing offshore wind farm developments may have a substantial impact on the structuring of coastal marine ecosystems on basin scales. [Footnote 14: Daewel, U., Akhtar, N., Christiansen, N. et al. Offshore wind farms are projected to impact primary production and bottom water deoxygenation in the North Sea. Commun Earth Environ 3, 292
(2022)]. The County is concerned that the vertical mixing caused by thousands of wind turbines will disrupt the natural processes of the Cold Pool, which is necessary to the local
ecosystem and economy. Therefore, the County requests that BOEM provide both a cumulative analysis of impacts to stratification of marine layers and associated biological production and nutrient cycling, as well as cumulative analysis of impacts to water oxygen levels.

Comment Number: BOEM-2024-0008-1010-0020
Commenter Type: Local Government
Organization: Cape May County, NJ

Comment Excerpt Text:

Marine Mammals

Data from NOAA scientists determined that the North Atlantic Right Whale's Potential Biological Removal (PBR) level is less than 1, meaning even a single death could upset the delicate balance required for a population stock to return to its optimum sustainable population. Yet incidental take requests authorized by NOAA and the National Marine Fisheries Services enable the injury, harassment, and incidental death of several North Atlantic Right Whales, which will almost certainly guarantee the continued decline, or even extinction, of the North Atlantic Right Whale. The County requests that BOEM provide an explanation of how it can recommend these projects in good faith given the current outlook for the North Atlantic Right Whale. BOEM already admitted in the Vineyard Wind EIS that, "Overall, it is anticipated that there would be no collective impact on global warming as a result of offshore wind projects," so then please explain the intended goal of this project and how the potential demise of the North Atlantic Whale is an appropriate trade off for such a project. [Footnote 15: Vineyard Wind
EIS] BOEM acknowledges it does not fully understand the effects of size, foundation type, and drive type o n the amount of sound produced during turbine operation. Therefore, BOEM's analysis of operational noise impacts is inadequate and cannot be relied on as fact
(See Appendix J.4.4.3, Overview of Acoustic Modeling Report, Ocean Wind 1 FEIS). Various studies have shown that compounding effects of multiple turbines within an array produce sound levels above the disturbance-level threshold for marine mammals. The County has cited peer-reviewed literature that demonstrates that source levels during construction and operation far exceed the safe noise-level thresholds for marine mammals. The County requests that BOEM
factor these studies into its analysis of Atlantic Shores North and include cumulative analysis of impacts to marine mammal migration patterns, ocean noise, construction noise, operational noise (including state-of-the-art acoustic modeling of operational noise across all marine mammal hearing bandwidths), and changes to food chain structures resulting from offshore wind installations (including plankton, filter feeders, and other small or microorganisms). [Footnote 16: Taking Marine Mammals Incidental to Ocean Wind Marine Site Characterization Surveys, New Jersey] [Footnote 17: Modelling of Noise Effects of Operational Offshore Wind Turbines including noise transmission through various foundation types] [Footnote 18: How loud is the underwater noise from operating offshore wind turbines?] [Footnote 19: Finneran, J. J. 2016. Auditory weighting functions and TTS/PTS exposure functions for marine mammals

exposed to underwater noise. Pp. 38 110 in National Marine Fisheries Service, Technical Guidance for Assessing the Effects of Anthropogenic Sound on Marine Mammal Hearing: Underwater Acoustic Thresholds for Onset of Permanent and Temporary Threshold Shifts. U.S. Department of Commerce, NOAA. NOAA Technical Memorandum. NMFS-OPR-55] [Footnote 20: 1502.16 Environmental consequences. The discussion shall include: (2) Any adverse environmental effects that cannot be avoided should the proposal be implemented.] [Footnote 21: Underwater Acoustic Assessment of Pile Driving during Construction at the Maryland Offshore Wind Project, Underwater Acoustic Assessment Report (May 2022). Marine Acoustics Inc.] [Footnote 22: Whale carcasses on Martha's Vineyard fuel speculation about wind turbines]

Comment Number: BOEM-2024-0008-1010-0022
Commenter Type: Local Government
Organization: Cape May County, NJ

Comment Excerpt Text:

Commercial Fishing

As a County that prides itself on its historic fishing culture and relies on fishing revenues for its economy, Cape May County has significant concerns about lost revenues for fishermen as a result of Atlantic Shores North, as well as other planned wind farms that will continue to restrict access to various parts of the ocean. There are reasons for both increased costs and loss of revenue. Fishermen may have to take longer routes to reach their destination, or travel at slower speeds while transiting wind farms. Fishermen may lose access to fishing grounds that were once relied on, forcing them to relocate and risk fishing in unfamiliar areas. In addition, as certain areas become off limits, the relocation of vessels to other known fishing areas could result in overfishing of those areas and the depletion of resources.

Comment Number: BOEM-2024-0008-1010-0024
Commenter Type: Local Government
Organization: Cape May County, NJ

Comment Excerpt Text:

Tourism & Recreation

The County acknowledges the prospects for new jobs the offshore wind industry may create. However, citing a testimony from the CEO of Orsted, the County is concerned that the vast majority of new jobs and investments have been made outside of the State of New Jersey and have no benefit to Cape May County. The County is uncertain that the creation of new full-time-equivalent jobs will be greater than the jobs lost in commercial fisheries and tourism. Currently, the vast majority of components and labor required for offshore wind projects are coming from foreign countries with no allegiance to the United States. Projections for 'hundreds of thousands of jobs' linked to offshore wind development and have not materialized and appear to be nothing more than politically motivated statements to gain the approval of labor unions and environmental groups. Empirical data tells another story. While the State of New Jersey claims that thousands of new jobs will be created, according to the developer of Ocean Wind 1, many of those jobs (500 or less) are short term, and only a small amount (69) are permanent jobs.

The South Fork wind project, according to the Department of the Interior, will produce only 165 short-term and 10 long-term jobs. Atlantic Shores believes that more than 40,000 jobs will be created by this project (See Table B.4-11). That is simply impossible and is a testament to the severity of public deception required to advance these projects, in addition to the manipulation of elected officials to gain their approval.
To potentially put hundreds of tourism and fishing-related workers out of jobs for such minimal job creation

is a violation of N.J.A.C. 7:7-15.4, which states that coastal energy facility construction and operation shall not directly or indirectly result in net loss of employment in the State for any single year. Coastal energy facility construction and operation resulting in the loss of 200 or more person-years of employment in jobs in New Jersey directly or indirectly related to the State's coastal tourism industry in any single year is prohibited by state law.

With an economy based almost entirely on tourism and commercial fishing, the County is unable to sustain drastic changes to its workforce and culture as a result of offshore wind farms. Small family businesses that have been operating for generations will face hardship and may be forced to close and sell existing assets, creating a vacuum for activities and services that have been routinely provided for residents and tourists for generations. Without these services, rental and home values will begin to decline in value and demand as the spirit and workforce of the Jersey Shore is lost.

Therefore, the County requests cumulative analysis on coastal housing and rental prices, recreation and tourism, commercial fishing and related industries, ocean traffic, navigability, and safety, and impacts to residential, commercial, and industrial ratepayers.

Comment Number: BOEM-2024-0008-1010-0025
Commenter Type: Local Government
Organization: Cape May County, NJ

Comment Excerpt Text:

Social Impacts

The socio-ecological value of the New Jersey coastline is multifaceted and intersects with many aspects of the coastal community profile. The ecological value aspect is responsible for residential and commercial development wind turbines have a negative effect on property value in locations where they are visible; house prices decrease by up to 8% after the construction of a wind turbine within viewshed. [Footnote 25: The Proceedings of the National Academy of Sciences] Coastal
communities across the nation and especially along the Atlantic coast are home to some of the most pristine real estate. Real estate development and procurement are among the top economic drivers in these areas, however, the placement of hundreds of wind turbines just a few miles from the coastline will not be a strong selling point for potential future sellers and buyers in Cape May County. In addition, dozens of historical properties will also be affected. Furthermore, environmental justice communities, who have been given no voice in these projects, will be exposed to poorer air quality as a result of increased vessel traffic.

Therefore, the County requests cumulative visual analysis from all historic properties and popular key vantage points; analysis of changes to ocean, seascape, landscape character units' character, and effects on viewer experience by the wind farm, vessel traffic, onshore landing sites, onshore export cable routes, onshore substations, converter stations or both, and electrical connections with the power grid; analysis on environmental justice communities, including effects on housing prices, loss of employment due to business disruptions, and hindrances to subsistence fishing; and analysis of impacts on local health issues arising from air quality degradation near ports and waterways associated with offshore wind vessel traffic.

Comment Number: BOEM-2024-0008-1010-0004
Commenter Type: Local Government
Organization: Cape May County, NJ

Comment Excerpt Text:

As BOEM moves forward in this process, it is of paramount importance that the agency consider the cumulative impacts to several areas of concern. Previously, the DEIS for Atlantic Shores South was

deficient in that it failed to examine cumulative environmental impacts as required by Federal regulations. In fact, federal regulations require that NEPA analyses must assess cumulative effects, [Footnote 1: 32 CFR 651.16] and determine the environmental consequences
of the action. The analysis should identify the cause-and-effect relationships, determine the magnitude and significance of cumulative effects, and identify possible avoidance or
mitigation measures. This project is just 1 of 48 or more proposed wind farms along the Eastern Seaboard, which collectively introduce various cumulative impacts which must be understood prior to construction. Furthermore, a failure to do so is a flagrant violation of federal regulation and moreover, a clear abdication of BOEM's commitment to managing the development of U.S. Outer Continental Shelf energy, mineral, and geological resources in an environmentally and economically responsible way. [Footnote 2: The Bureau of Ocean Energy Management (BOEM)] BOEM and NOAA's own scientists are aware of the environmental perils of offshore wind projects, yet BOEM continues its cavalier approach in advancing the boundless industrialization of the ocean. BOEM has failed in its mission to manage the development of offshore wind projects in an environmentally and
economically sound manner consistent with the requirements under NEPA regulations by failing to quantify cumulative impacts. [Footnote 3: 932 CFR 651.16 In addition, Federal courts have recognized the importance of including cumulative impacts under NEPA. For example, see Kleppe v. Sierra Club, 427 U.S. 390, 413 (1976)] Once constructed, thousands of acres of offshore wind farms will undoubtedly have impacts on the marine environment as well as atmospheric impacts from wind wakes produced by wind turbines, which produce a net-warming effect. [Footnote 4: Akhtar, N., Geyer, B. & Schrum, C. Impacts of accelerating deployment of offshore windfarms on near-surface climate. Sci Rep 12, 18307 (2022). https://doi.org/10.1038/s41598-022-22868-9.]

Comment Number: BOEM-2024-0008-1010-0005
Commenter Type: Local Government
Organization: Cape May County, NJ

Comment Excerpt Text:

The only evidence BOEM provided of its analysis of cumulative impacts previously is in regard to the viewshed from locations across South Jersey. BOEM does not offer any technical cumulative analysis of environmental impacts from the dozens of other proposed wind projects which will result in several similar actions in the same geographic area.

Comment Number: BOEM-2024-0008-1010-0006
Commenter Type: Local Government
Organization: Cape May County, NJ

Comment Excerpt Text:

In previous Environmental Impact Statements for offshore wind, BOEM has refused to adequately address cumulative environmental impacts of the 48 or more proposed windfarms in the Mid-Atlantic, and it must not continue this practice. BOEM must define the scale of its spatial and temporal analysis to prevent it from appearing arbitrary in determining which future projects to include in its cumulative analysis. BOEM's selection must be representative of its permitting schedule and the Administration's offshore wind goals until at least 2030 or later. The County requests that BOEM analyze the Atlantic Shores North project together with the complete build-out of proposed offshore wind farms in the region.

Comment Number: BOEM-2024-0008-1094-0009
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

Proposed action fails to evaluate the cumulative impact of all offshore wind in the region.

Comment Number: BOEM-2024-0008-1106-0051
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

- Assessment of cumulative impacts of this and other adjacent offshore wind projects on hydrodynamics and oceanographic and atmospheric conditions in the region- this includes changes in distribution, aggregation, and abundances of plankton and associated biological effects on North Atlantic right whales as well as other large whales and various species of planktivorous pelagic fish;

Comment Number: BOEM-2024-0008-1106-0060
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

Cumulative Impacts
The EIS should include a complete analysis of the cumulative impacts of all phases of the Project in combination with any past, present, and reasonably foreseeable future actions. This includes but is not limited to: energy infrastructure (including existing and future wind energy projects); sand mining; aquaculture; vessel activity; fisheries management actions; disposal sites; and other development projects. It is important that any cumulative impacts are analyzed separately and distinct from analyses of Project-specific impacts. Using the potential impacts of all other ongoing or future Projects to dilute impacts of the Project on this larger scale should be avoided.
The Cumulative Impacts section should specifically address impacts of overlapping and adjacent projects on protected species; habitat; and fisheries resources, operations, and associated communities. Specific information related to the timing of the construction activity and the expected number of proposed construction seasons is important. For example, nearby projects with similar construction schedules may result in pile driving activities occurring in the area over multiple seasons in a row, which may result in cumulative impacts on recruitment that one stand- alone Project may not. Additionally, vessel strike threats to protected species and existing and proposed transmission cables should be evaluated for additive impacts with respect to construction, operation, and decommissioning timelines. Effects on oceanographic and atmospheric conditions in the region, including to the Mid-Atlantic Cold Pool, and associated ecosystem effects should also be considered in the cumulative effects analysis. Similarly, fishing effort displaced from existing lease areas may not be able to shift to other locations due to lack of target species availability, fishery regulations and permit restrictions that limit where a vessel can fish, and gear conflicts with other fishing vessels.

Comment Number: BOEM-2024-0008-1108-0001
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

Cumulative Impacts
- The proposed project area encompasses regions with active and growing ports and other industrial activities. It will be important to consider expansions at nearby port, as they will likely increase vessel traffic, emissions, and truck activity. Accounting for impacts from these past, present, and reasonably foreseeable projects is essential to help the public better understand the cumulative impacts from proposed project activities and can also assist BOEM in coordinating with lead agencies of other projects to reduce impacts from vessel/truck traffic and congestion.

Comment Number: BOEM-2024-0008-1112-0010
Commenter Type: Local Government
Organization: Sea Girt New Jersey

Comment Excerpt Text:

A concern as to why other seemingly similar projects (in other local / national / world-wide waterfront communities) have apparently been stopped I halted/ abandoned;

A.3.21 Proposed Action/Project Design Envelope

Comment Number: BOEM-2024-0008-0138-0012
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

The COP lacks analysis of decommissioning impact, even for a single turbine as illustrative, nor even the technical feasibility of doing it, and no binding, enforceable, penalty mechanism for the European companies to do it when the time comes.

Comment Number: BOEM-2024-0008-0138-0024
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

An accurate or adequate projection of the number of vessels to be used in the construction, operation, and decommissioning of the project.

Comment Number: BOEM-2024-0008-0594-0002
Commenter Type: Individual
Commenter: Kerry McGrath

Comment Excerpt Text:

This is greenwashing and greed, not environmentally friendly energy. 157 (1049ft) turbines and 8

offshore substations all connected by close to 600 miles of high voltage, EMF emitting cables one foot thick laid in the seabed of a pristine ocean - do you truly understand what effect will this have on marine life, let alone fisheries? We can't afford to be on the wrong side of history when it comes to industrializing the ocean!!!

Comment Number: BOEM-2024-0008-0611-0019
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

Turbine Removal. As the COP correctly notes, current rules, 30 CFR 585.902, require Atlantic Shores to remove or decommission all facilities, projects, cables, pipelines, and obstructions and clear the seabed of all obstructions created by activities on the leased area, including any project easements(s). There is a huge difference between removal and decommissioning, the latter only requiring that facilities be put out of service.

Prior EISs have not honestly disclosed the fact that it is very unlikely that at the end of their useful life, turbine foundation sections will be cut and removed with the towers and taken to shore to be cut into rail or truck size pieces, processed, recycled or disposed of. It is doubtful that the wind industry will take any of its limited wind turbine installation vessels away from new projects to do such removals. There is no onshore infrastructure to cut and process the towers and foundation sections even if they get ashore. With no hard requirement to remove the towers and foundation sections, it is not realistic to expect that such infrastructure will evolve. Therefore the project impacts we speak of are not a 15 to 20 year impact, but impacts to be experienced by many future generations, or those future generations will bear the effort and cost to remove them. This EIS should either present an acceptable technical and cost feasibility analysis of turbine removal and processing, or acknowledge that outcome.

Comment Number: BOEM-2024-0008-0611-0056
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

The use of a Project Design Envelope. The substitution by the BOEM of a project design envelope (PDE) for what NEPA rules require as a proposed action is contrary to one the purposes of the NEPA EIS, i.e., to identify agency options that can meet program objectives with lesser, not the most, environmental impact.

First, it should be noted that the BOEM 2018 guidance for the use of PDEs was never finalized. It its draft form it only related to BOEM's review of the COP, there was no analysis or justification of its applicability to meeting the NEPA requirements for an EIS.

Comment Number: BOEM-2024-0008-0611-0057
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

Regarding its use under NEPA, the PDE requires that the parameter having the maximum impact for a given resource be used in the analysis. This is not specified now in the COP but if and when that identification is done and the PDE is the proposal, it means that the BOEM is proposing an action that will have the worst environmental impact possible. Assuming the BOEM would never select this, then it

is proposing something that it will never choose which makes little sense.

The BOEM needs to separate the PDE concept from the proposed action. The PDE may have some use to show a maximum impact and possibly avoid supplemental analyses but it should not be used as the proposal. They are two different things, and the use of a PDE does not absolve the BOEM of presenting an actual proposal under NEPA rules.

Further, the PDE proposed thus far is not an envelope at all because it does not specify which parameter will be used to determine the maximum impact for a given resource. In addition, vague terminology like "up to 157 turbines" does not create an envelope. The PDE stated also does not include key parameters like the plan for the northern portion of the lease area, and the turbine power and drive type, which are essential to analyzing maximum impacts. It also presents as options parameters that have already been decided through the State's project approval like the use of monopile foundations and Vesta-236 turbines.

Comment Number: BOEM-2024-0008-0633-0019
Commenter Type: Federal Agency
Organization: Mid-Atlantic Fishery Management Council and New England Fishery Management Council

Comment Excerpt Text:

The materials provided with the NOI indicate that three wind turbine and offshore substation foundation types are under consideration (monopile, mono suction bucket, and gravity-based). We appreciate the clarification that one foundation type will be selected for use throughout the project area; they will not be mixed and matched. The documents also indicate that up to eight small, four medium, or three large offshore substations will be considered. In addition, the export cable may use HVAC or HVDC. These design options result in a wide project design envelope (PDE). We understand that a sufficiently wide PDE is necessary to assess various tradeoffs, to allow final decisions to be made based on the best technically feasible options, which can change over time, and to allow for public input on which parameters may be preferred. However, each of these design choices will have different environmental impacts and an overly wide PDE can pose challenges for thoroughly evaluating and understanding the range of possible impacts of the project. This can also pose challenges for essential fish habitat (EFH) consultations. In some cases, it may be appropriate for some of these design choices to be analyzed as separate alternatives to help provide clarity on how impacts may differ and the relevant tradeoffs.

Comment Number: BOEM-2024-0008-0633-0027
Commenter Type: Federal Agency
Organization: Mid-Atlantic Fishery Management Council and New England Fishery Management Council

Comment Excerpt Text:

The Councils have not endorsed a specific cable burial depth, but rather have recommended depths that are adequate "to reduce conflicts with other ocean uses, including fishing operations and fishery surveys, and to minimize effects of heat and electromagnetic field emissions" (from the BOEM Draft Fisheries Mitigation Guidance). Assuming a depth of 6 feet is sufficient to address these objectives, we recommend that BOEM require all project cables to be buried to a minimum depth of 6 feet. Sufficient burial depth is especially important to the surfclam and ocean quahog dredge fisheries.

Comment Number: BOEM-2024-0008-0633-0028
Commenter Type: Federal Agency
Organization: Mid-Atlantic Fishery Management Council and New England Fishery Management Council

Comment Excerpt Text:

Where AC to DC conversion is required (e.g., if the export cables will use HVAC), closed-cycle systems should be considered to minimize entrainment of larvae.

Comment Number: BOEM-2024-0008-0633-0008
Commenter Type: Federal Agency
Organization: Mid-Atlantic Fishery Management Council and New England Fishery Management Council

Comment Excerpt Text:

An overly wide project design envelope (PDE) poses challenges for thoroughly evaluating and understanding the range of possible impacts of the project.

Comment Number: BOEM-2024-0008-0655-0002
Commenter Type: Individual
Commenter: Susan Connaughton

Comment Excerpt Text:

The wind turbines are an expensive and inefficient source of power for their 'productive' life span. There is no method of removing them when they fail. They are to simply collapse into our ocean and deteriorate in a toxic pool of chemicals and rusting medals. No method of recycling lithium and any portion of these structures exists.

Comment Number: BOEM-2024-0008-0711-0002
Commenter Type: Individual
Commenter: allen magrini

Comment Excerpt Text:

I. HEIGHT AND LOCATION OF TURBINES

1. The proposed turbines have a height of 1,046 feet (tallest in world).
2. The proposed turbines are located just 8.4 miles o? the LBI coast. This makes them one of the closest arrays to land in world.

The combined impact of the turbine height and their proximity to shore are the main causes of the negative impacts the proposed turbines have on:

A. Views of the ocean and pristine skyline from the shore;
B. Historic properties;
C. Beach area property values. Views are a factor that New Jersey tax assessors take into account in assessing beach front and beach area properties; and
D. New Jersey coastal tourism.

Comments/Questions;

1. What is BOEM's justification for permitting turbines 1046 feet tall?
2. What is BOEM's justification for allowing turbines to be located just 8.4 miles o? he New Jersey coast line?
3. Has BOEM considered and has it calculated the impact on beach front and beach area reduced property values and reduced local property tax revenues resulting from turbine impacted views?
4. The ASN Project has significant negative visual impacts on numerous historic properties including several on the National Historic Register. How can those impacts be truly mitigated? While payments in lieu may be made as mitigation, that. Is not true mitigation. The only true way to mitigate is to reduce the height of the turbines and to move them further o?shore. BOEM should require these changes.

Comment Number: BOEM-2024-0008-0761-0011
Commenter Type: Individual
Commenter: John Deputato

Comment Excerpt Text:

That study asked respondents about wind turbines that were over 500 feet tall, much smaller than the ones being planned.

Comment Number: BOEM-2024-0008-0778-0001
Commenter Type: Individual
Commenter: Prof. Edgar Gunter

Comment Excerpt Text:

Essentially wind turbines represent a secondary form of energy and hence are not reliable during a heavy winter storm when the energy is needed the most.

Comment Number: BOEM-2024-0008-0818-0001
Commenter Type: Individual
Commenter: John O'Keeffe

Comment Excerpt Text:

As a homeowner on LBI I am opposed to the wind turbine project. I have read articles stating how inefficient the wind turbines are and additionally the life span of the the turbines is significantly less than expected. Some projects in Europe have been abandoned due to rising costs. Not to mention that some wind farms have had to replace turbines after half of what the expected life span is.

Comment Number: BOEM-2024-0008-0934-0003
Commenter Type: Individual
Commenter: Tiffany Strout

Comment Excerpt Text:

I could go on and on about all the carbon and fossil fuel used in the creation of the turbines, all the hydronic oil needed to run the turbines, the fact that there needs to be a coal plant or another more stable source of energy still running at all time to account for when the turbines are not able to work such as in high winds, the fact that the east coast is having stronger storms with 60-90 mph winds more frequently which will result in the turbines unable to work, the fact that there is not proposal to show what will happen to the turbines when they have past their working capacity, they are not recyclable so the options

are to bury them or push them over in the ocean expelling forever chemicals into the ecosystem.

Comment Number: BOEM-2024-0008-0970-0003
Commenter Type: Individual
Commenter: denise boccia

Comment Excerpt Text:

Notice of Intent to Prepare an EIS Federal Register:
https://www.federalregister.gov/documents/2024/03/18/2024-05649/notice-of-intent-to- prepare-an-environmental-impact-statement-for-the-proposed-atlantic-shores-north
Atlantic Shores' goal is to develop a commercial-scale o?shore wind energy facility in the Lease Area to provide renewable energy to the States of New Jersey and/or New York. Atlantic Shores proposes to construct up to 157 wind turbine generators (WTG) in a 1.1 mil 0.7 mi (1 nm x 0.6 nm) grid distributed across the Lease Area. Up to 8 small, 4 medium, or 3 large o?shore substations (OSS) are proposed within identified rows of structures. There may also be one permanent meteorological (met) tower constructed and up to two temporary meteorological and oceanographic (metocean) buoys installed during construction. Together, the WTGs, OSSs, and met tower and metocean buoys consist of up to 168 o?shore structures (Proposed Action).

Comment Number: BOEM-2024-0008-0970-0004
Commenter Type: Individual
Commenter: denise boccia

Comment Excerpt Text:

Two o?shore export cable corridors (ECC) are proposed to transmit electricity from the lease area to shore. The proposed Monmouth ECC would make landfall in Sea Girt, New Jersey. The proposed Northern ECC may split, making landfall in the New York City area or in the Asbury Park, New Jersey, area. Multiple onshore interconnection cable routes have been identified from the landing sites to five proposed points of interconnection (POIs). The proposed POIs are the Larrabee and Atlantic substations in Monmouth County, New Jersey; Fresh Kills and Goethals substations in Richmond County, New York; and Gowanus substation in Kings County, New York. Atlantic Shores is actively seeking one or more o?shore renewable energy credit (OREC) or power purchase agreement (PPA) awards for this project.

Comment Number: BOEM-2024-0008-0987-0001
Commenter Type: Individual
Commenter: Paul Beisel

Comment Excerpt Text:

What is the lifespan of these wind turbines? Is that the same in a salt water environment that is prone to hurricanes?

Comment Number: BOEM-2024-0008-1007-0012
Commenter Type: State Government
Organization: New York State

Comment Excerpt Text:

c. Evaluate deeper cable burial depths in federally maintained navigation features. The COP states that, "[t]he burial depth may be deeper in specific locations such as Federal channels that are dredged to ensure that the cables maintain a sufficient depth of cover." The Agencies recommend a minimum cable burial depth of 15 feet below the existing seabed or below the authorized depth in federally authorized channels, and anchorages, whichever is deeper, and where determined by the Cable Burial Risk Assessment (CBRA). All certificated NYS offshore wind cable projects crossing these types of assets have been required to meet the 15-foot burial depth in NYS waters as part of the project- specific NYS Public Service Law Article VII Certification Conditions. Additionally, this depth requirement aligns with federal guidance from the U.S. Army Corps of Engineers. References to support BOEM's analysis can be found in the Cables Assessment, Maritime Technical Working Group (M-TWG) Anchor Strike Study (2021){{Footnote 8: Source: https://nymtwg.com/wp-content/uploads/2023/02/MTWGAnchorPenetrationandStrikes_FinalReport_2021.pdf}}, and the M-TWG Cabling Workshop Summary (2023).{{Footnote 9: Source: https://nymtwg.com/wp-content/uploads/2023/04/Workshop-Summary-Report.pdf}} For locations outside of federally maintained navigation features, the Agencies recommend a six-foot target burial depth where technically feasible.

Comment Number: BOEM-2024-0008-1007-0006
Commenter Type: State Government
Organization: New York State

Comment Excerpt Text:

1. Analyze the following as EIS alternatives to the Proposed Action:

a. Minimize footprint of export cable routes: The Agencies support an alternative to minimize environmental impacts by requiring the smallest feasible export corridor footprint. This alternative could be achieved by maximizing use of high-voltage direct current (HVDC) cables, using higher voltage cables, reducing cable spacing within the project, and/or by co-locating with other projects to minimize the overall footprint. Data supporting the need to minimize footprints can be found in the NYSERDA Offshore Wind Cable Corridor Constraints Assessment (Cables Assessment).{{Footnote 2: Source: https://www.nyserda.ny.gov/-/media/Project/Nyserda/Files/Programs/Offshore-Wind/2306-Offshore-Wind-Cable- Corridor-Constraints-Assessment--completeacc.pdf}}

Comment Number: BOEM-2024-0008-1028-0001
Commenter Type: Advocacy Group
Organization: BlueGreen Alliance

Comment Excerpt Text:

As BOEM works to develop the EIS, we urge the agency to ensure that offshore wind equitably achieves the maximum beneficial impacts by including robust assessment of whether the project meets the following standards:

- Maximizes the creation of quality, high-paying union jobs over projects' lifetime;
- Expands U.S. manufacturing along robust domestic, regional, and local supply chains;
- Delivers community benefits with attention to improving access to disadvantaged communities;
- Protects fisheries, wildlife, and marine ecosystems by utilizing data sharing, the best available science

and data, and adaptive management strategies to avoid, minimize, mitigate, and monitor environmental impacts; and
- Is guided by robust and inclusive stakeholder engagement, including labor organizations, Tribal nations, systematically marginalized communities, low-wealth communities, communities of color, and impacted ocean users.

Comment Number: BOEM-2024-0008-1028-0002
Commenter Type: Advocacy Group
Organization: BlueGreen Alliance

Comment Excerpt Text:

we strongly urge BOEM to provide greater detail related to:

- Potential employment benefits, including job training, job-quality, and accessibility;
- Strategies to avoid, mitigate, minimize, and monitor adverse impacts to communities, wildlife, and the environment;
- Data transparency regarding community engagement and oversight of monitoring activities related to pollutants associated with development; and
- Robust stakeholder engagement that includes ocean-users, communities and all impacted Tribes within the geography that reflects their historical presence in the regions impacted by offshore wind development.

Comment Number: BOEM-2024-0008-1028-0020
Commenter Type: Advocacy Group
Organization: BlueGreen Alliance

Comment Excerpt Text:

The EIS should analyze potential cumulative impacts; benefits of mitigation measures; and adaptive management strategies. The analysis should include all relevant data and acknowledge relevant scientific disagreements and data gaps. Avoiding sensitive habitat areas, requiring strong measures to protect wildlife throughout each state of the development process, and comprehensive monitoring of wildlife and habitat before, during, and after construction, are all essential for the responsible development of offshore wind energy. The combination of alternatives should be chosen that ensures communities, wildlife, and the environment are protected while maximizing the creation of quality, high-paying jobs, and economic benefits.

Comment Number: BOEM-2024-0008-1040-0010
Commenter Type: Individual
Commenter: Denise Boccia

Comment Excerpt Text:

Where is the site assessment plan and the BOEM approval of that for this lease area? It seems that BOEM has skipped this step in its regulations?

Comment Number: BOEM-2024-0008-1040-0015
Commenter Type: Individual
Commenter: Denise Boccia

Comment Excerpt Text:

Has an ADLS system been approved by the FAA for any large offshore wind projects?

Comment Number: BOEM-2024-0008-1040-0016
Commenter Type: Individual
Commenter: Denise Boccia

Comment Excerpt Text:

How was the eastern boundary set for the NJ task force in evaluating possible wind areas?

Comment Number: BOEM-2024-0008-1040-0017
Commenter Type: Individual
Commenter: Denise Boccia

Comment Excerpt Text:

How was the western carve out of the potential wind area determined?

Comment Number: BOEM-2024-0008-1043-0007
Commenter Type: Local Government
Organization: Borough of Sea Girt, NJ Planning Board

Comment Excerpt Text:

A concern that the long-term environmental soundness of the project has not been sufficiently identified, studied, and shared

Comment Number: BOEM-2024-0008-1044-0001
Commenter Type: Industry
Organization: ECOncrete

Comment Excerpt Text:

The Notice Of Intent (NOI) to draft a Programmatic Environmental Impact Statement (PEIS) specified that Atlantic Shores North, leasing area OCS-A 0549, intends to install up to "157 WTGs, 8 small OSSs, 14 one permanent met tower, two temporary metocean buoys, up to 8 offshore export cables (with a maximum total length of 416.5 mi [670.2 km]), 466 mi (750 km) of inter array cables, and 62.1 mi (100 km) of inter-link cables, along with associated scour and cable protection." (COP Volume 1, Section 4.11: Atlantic Shores 2023). The COP also indicates that six types of scour protection methods may be used for these structures: 1. Rock placement, 2. Rock bags, 3. Grout- or sand-filled bags, 4. Concrete mattresses, 5. Ballast-filled mattresses, and/or 6. Frond mattresses (COP Volume I, Section 4.2.5; Atlantic Shores 2023). Within the lease area, the maximum total area of permanent seafloor disturbance is 876.8 acres, which would result in permanent impacts on benthic and demersal finfish, invertebrates, and their respective fish habitats. However, "the Project is expected to produce ecological benefits by creating new, hard substrate habitat for benthic species, thereby potentially increasing species abundance of invertebrate species that prefer hard substrates such as mussels, crabs, sea anemone, encrusting worms and barnacles

(English et al. 2017, Ledeke 2015)" (COP Volume II, Section 4.5.2.5; Atlantic Shores 2023).

Given the aforementioned details above, all concrete materials should solely be fabricated from ecological concrete, including all cable and scour protection, in order to minimize negligible impacts and create marine habitat opportunities. When using concrete mattresses and scour protection, bioactive concrete (i.e., with bio-enhancing admixtures) should be used as the primary scour protection or veneer to support biotic growth. Furthermore, the species that settle and grow on the ecological concrete mattress and cable protection would create a living layer providing bioprotection which hardens the structure.

Comment Number: BOEM-2024-0008-1044-0002
Commenter Type: Industry
Organization: ECOncrete

Comment Excerpt Text:

In a recent technical report, The Nature Conservancy (TNC) recommended nature-based designs for cable protection and scour protection. Ecological concrete technology is also featured in the Wind Energy Monitoring & Mitigation Technologies Tool developed by the International Energy Agency Wind Task 34 (WREN), the Pacific Northwest National Laboratory, and the National Renewable Energy Laboratory. Specifying nature-based features in Atlantic Shores North would further capitalize on existing carbon goals and nature-inclusive frameworks laid out by the White House and the Council on Environmental Quality (CEQ), the USACE's Engineering with Nature report, including the resiliency of future climate action strategies.

Comment Number: BOEM-2024-0008-1044-0003
Commenter Type: Industry
Organization: ECOncrete

Comment Excerpt Text:

Ecological design elements should be incorporated into offshore wind infrastructure, specifically for scour and cable protection where the benthic habitat could be maximized. Using nature-based design elements significantly increases species settlement, richness, and abundance. Nature-based design elements allow the structure to actively provide carbon sequestration, decrease the magnitude and frequency of maintenance leading to increased structural lifespan. Using ecological concrete as a mitigation measure and design alternative supports compliance with strict environmental regulations. The term "ecological concrete" is an alternative to traditional concrete that's material composition enhances or encourages the growth of flora or fauna when placed in the marine environment. Ecological concrete may include recycled materials, such as recycled or reclaimed concrete, resulting in reduced greenhouse gas emissions compared to traditional concrete.

Comment Number: BOEM-2024-0008-1069-0015
Commenter Type: Advocacy Group
Organization: Clean Ocean Action

Comment Excerpt Text:

The Atlantic Shores North project will likely use once-through cooling systems for its substations, as this method is currently the only economically feasible method of cooling HVDC systems.

Comment Number: BOEM-2024-0008-1069-0023
Commenter Type: Advocacy Group
Organization: Clean Ocean Action

Comment Excerpt Text:

With the National Marine Fisheries Service ("NMFS"), BOEM needs to incorporate more parameters related to once-through cooling in the project design envelope, such as ranges for the amount of water that would be pumped through, amount of biocides that would be discharged, and effects on local water temperature.

Comment Number: BOEM-2024-0008-1083-0006
Commenter Type: Local Government
Organization: Borough of Sea Girt, New Jersey

Comment Excerpt Text:

We oppose the proposed method of running cables through our coastal waters in the Atlantic. The prospect of tearing up vast swathes of the ocean floor to accommodate these cables is deeply concerning, given the environmental impact and disruption to our infrastructure and quality of life. The trenching required for cable installation would irreversibly damage essential fish habitat and disrupt delicate marine ecosystems, contradicting principles of preservation and conservation.

Comment Number: BOEM-2024-0008-1088-0001
Commenter Type: Individual
Commenter: Mary O'Keeffe

Comment Excerpt Text:

I am a homeowner on LBI. I am opposed to the wind turbines as they are planned to be only 8.4 miles from the shoreline.

Comment Number: BOEM-2024-0008-1094-0013
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

Project area name "New York Bight" misrepresents impact on NJ citizens and chills participation.

Proposed action will harm NJ citizen stakeholders to benefit citizens of New York violating equal protection.

State of New Jersey is derelict in its duties and federal actors exploit such dereliction to benefit citizens of New York.

New Jersey actors pander to federal actors to garner political favor.

Comment Number: BOEM-2024-0008-1096-0005
Commenter Type: Individual
Commenter: Teresa Boyle-Vellucci

Comment Excerpt Text:

The wind farms, as currently proposed, are as close as nine miles from the shore of Long Beach Island. There are no wind farms located or being proposed to be located so close to a community shoreline in the world, let us repeat that, in the world. This is unprecedented and unacceptable. In addition, the size of the windmills, which could involve the installation of as many as 157 wind turbines, as we understand, are the largest to be put in place to date. The community in LBI and our beautiful Atlantic Ocean is a test case, unproven.

Comment Number: BOEM-2024-0008-1106-0003
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

General Comments
The Atlantic Shores North proposal includes a project design envelope (PDE) approach, which allows a project proponent the option to submit a reasonable range of design parameters within its permit application. The current PDE for this project includes a broad range of foundation types, numbers and sizes of OSSs, and methods of installation. A broad PDE that is not refined early enough in the process creates challenges for defining the effects of the proposed action and providing an accurate analysis of those effects in the EIS and the consultations under section 7 of the ESA and the essential fish habitat (EFH) provisions of the Magnuson-Stevens Act. It also has the potential to create inefficiencies and delays in the regulatory process. We recommend the NEPA document refine the PDE to a reasonably scoped proposed action that reflects a project that is feasible and likely for construction: the proposed action described in the draft EIS should be consistent across all regulatory documents (i.e., MMPA ITA application, ESA biological assessment, and EFH assessment). We expect that as the project moves through the regulatory process, the PDE may be refined or modified to reflect environmental and technical feasibility or to respond to agency and stakeholder feedback, reduce impacts to marine resources and ocean uses/users such as fisheries, and/or better align the proposed action with the developer's intended project (i.e., what is technically feasible and likely to be implemented). We recommend this refinement of the PDE to a more focused proposed action, as well as identification of any economic or technical constraints, occur early enough in the process that BOEM can evaluate a realistic and feasible proposed action and associated alternatives in the draft EIS. We also recommend BOEM develop and consider a full range of reasonable alternatives to the proposed action and avoid narrowing the range as the PDE is refined or as power purchase/electricity offtake agreements are acquired by the developer. In addition, we urge BOEM to limit changes to the proposed project and alternatives in late stages of the NEPA process, particularly after the draft EIS has been published. Substantial changes to the proposed action and alternatives late in the NEPA process may require supplemental NEPA review, changes to the identified alternatives, and modifications to the MMPA ITA application and/or consultation documents. These steps are likely to affect the project schedule. We recommend any changes to the PDE or the proposed action and alternatives be communicated to cooperating agencies in a timely manner, to reduce delays and maintain efficiencies in the process.

Comment Number: BOEM-2024-0008-1106-0053
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

- Landfall locations should evaluate impacts of dredging, pier modifications/construction, HDD operations, and cumulative impacts of other projects proposing to use the same connection points;

Comment Number: BOEM-2024-0008-1108-0036
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

General Comments
- EPA relies on the information in the Atlantic Shores COP to inform technical comments provided during the scoping process. Therefore, any changes made to the COP may modify our assessment of potential impacts. In the EIS, BOEM should make clear where changes or uncertainties in the COP could occur and evaluate how those changes affect the impacts to each of the resource areas. Should any updates be made to the COP, EPA recommends another opportunity to review the document and supply additional comments.

Comment Number: BOEM-2024-0008-1108-0039
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

- Other offshore wind projects have recently encountered construction issues related to monopile refusal in glauconite soils. The EIS should explain whether these soils, or other geologic formations, present barriers to construction of the project or the use of portions of the lease area due to unsuitable conditions.

Comment Number: BOEM-2024-0008-1108-0043
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

Project Design
- EPA appreciates considerations in WTG layout and spacing that are sensitive to impacts on fishing, vessel operations and transit corridors. We further acknowledge efforts to achieve uniformity in layout with respect to neighboring wind farms to maximize efficiency and avoid impacts associated with adjacent projects. To this end, the EIS should further evaluate the potential for common cable corridors for neighboring projects that could reduce impacts to marine resources.
- Additionally, EPA recommends BOEM carefully consider optimizing the wind farm layout with respect to spacing and orientation of adjacent WTGs such that turbulent flow and wake effects, which reduce overall project efficiency, are minimized.
- BOEM should address how reasonable changes in wind turbine technology may impact the project.

Comment Number: BOEM-2024-0008-1109-0004
Commenter Type: Advocacy Group
Commenter: Marlene Asselta
Organization: Southern New Jersey

Comment Excerpt Text:

SNJDC believes Atlantic Shores has sited the projects' facilities and utilized a Project Design Envelope (PDE) to maximize renewable energy production, minimize environmental effects, minimize cost to ratepayers, and address stakeholder concerns. The PDE proposed by Atlantic Shores will not exceed an unreasonable level of effects to the environment, ocean users, or the communities in the proposed project footprint.

Comment Number: BOEM-2024-0008-1112-0011
Commenter Type: Local Government
Organization: Sea Girt New Jersey

Comment Excerpt Text:

A concern regarding the seemingly unknown financial viability of the Developer and the project;

Comment Number: BOEM-2024-0008-1112-0006
Commenter Type: Local Government
Organization: Sea Girt New Jersey

Comment Excerpt Text:

A concern that the long-term efficiency and benefits of the proposed alternative energy source have not been fully substantiated / studied / documented/ vetted/ shared;
g. A concern that the long-term environmental soundness of the project has not been sufficiently identified, studied, and shared;

Comment Number: BOEM-2024-0008-1112-0008
Commenter Type: Local Government
Organization: Sea Girt New Jersey

Comment Excerpt Text:

A Concern regarding the seeming lack of qualified I distributed / substantiated research confirming that the project can be developed without causing substantial detriment to the public good;

Comment Number: BOEM-2024-0008-1138-0005
Commenter Type: Individual
Commenter: Kathleen Harper

Comment Excerpt Text:

I also am worried about these wind turbines in hurricanes. They have not built wind turbines as big as they are building those off of our shore, over a thousand feet. They do not get the winds and the storms like we do over in Europe, so you cannot compare the fact that these wind turbines will withstand a hurricane because they have never been through one.

Comment Number: BOEM-2024-0008-1138-0007
Commenter Type: Individual
Commenter: Kathleen Harper

Comment Excerpt Text:

We also need to worry about they don't really work. They are finding that over in Europe, they don't work, they have had blackouts and brownouts, who can forget what happened in Texas when we lost several people because the wind turbines stopped working in the freezing rain and snow. We get that on the east coast ten times worse.

Comment Number: BOEM-2024-0008-1196-0001
Commenter Type: Advocacy Group
Commenter: Anthony Taddeo
Organization: New Jersey League of Conservation Voters

Comment Excerpt Text:

Embracing offshore wind represents a critical stride in bolstering our resilience against the impending threat of climate change. This transition not only brings about environmental benefits, but also signifies a transformation shift towards a more sustainable and prosperous future. By harnessing the potential of offshore wind, we have the opportunity to foster cleaner air and improve health outcomes for all residents of our state.

Comment Number: BOEM-2024-0008-1196-0002
Commenter Type: Advocacy Group
Commenter: Anthony Taddeo
Organization: New Jersey League of Conservation Voters

Comment Excerpt Text:

Moreover, embracing offshore wind aligns with our state's renewable energy goals, providing a pathway of increasing job opportunities, enhance air quality and combat climate change. The anticipated benefits of this project are immense. With an estimated annual reduction of 6.3 million tons of greenhouse gas emissions, equivalent of removing 1.2 million cars from the road and significant contributions to New Jersey's economy, totaling in 2.2 billion in value added. Offshore wind promises to bring sustainable growth and prosperity to our communities. Atlantic Shore's proposal to construction the wind turbines and several substations underscores the scale of the endeavor. As we safeguard the well-being of our current generations, we must also consider the legacy for our future ones. Prioritizing renewable energy solutions like offshore wind, we lay the foundation for environmental stewardship and intergenerational equality. Embracing offshore wind is about more than environmental responsibility. It's a moral obligation and strategic investment in our longevity and vitality of our communities.

Comment Number: BOEM-2024-0008-1199-0001
Commenter Type: Individual
Commenter: Samantha Gardner

Comment Excerpt Text:

But, what I will say is that the research presented here today is so skewed. For example, you say the so called renewable energy will improve pollution, but you state the wind turbines only last 30 years and only 75 percent recyclable. That may sound like a large percentage in the way you have presented but

considering the turbines over are over thousand feet tall each, that's tons of unrecyclable material going into the landfills. According to one study, in 2034, there will be 225,000 metric tons of wind turbine blade waste. That number came from the NIH, the National Institute of Health.

Comment Number: BOEM-2024-0008-1205-0005
Commenter Type: Advocacy Group
Commenter: Bob Stern
Organization: Save Long Beach Island Incorporated

Comment Excerpt Text:

Finally on decommissioning, I think you would have to be honest with the public, the rules do not require removal of these projects after useful life, they only require they be put out of service. It does not appear feasible to remove them, so once they are out there, I think they will be out there forever, you need to address this honestly in the EIS.

A.3.22 Purpose and Need

Comment Number: BOEM-2024-0008-0081-0004
Commenter Type: Individual
Commenter: Patrick Cozza

Comment Excerpt Text:

This whole initiative is driven by an overwhelming, blinded desire to create wind energy, regardless of the fact that it has been conclusively proven the ability to transfer and make available electricity from wind with NOT be available given the inability of energy grids and substations to transfer the electricity by 2030.

Comment Number: BOEM-2024-0008-0138-0019
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

To be legally adequate, the COP and future EIS must explain how the proposed Action will achieve its stated purpose. In ASOWNJ's case, the COP indicates that the Action is being proposed because there is "a worldwide climate crisis", and because the Action will result in a net reduction of carbon dioxide in the atmosphere. But the analysis stops there. How exactly will this CO2 reduction result in the lowering of worldwide climate temperatures?

Comment Number: BOEM-2024-0008-0464-0001
Commenter Type: Individual
Commenter: Marisol Vazquez

Comment Excerpt Text:

There have been no solid studies that show a positive impact on the environment. What has been seen is wind turbines have a negative impact, affecting wildlife and destroying the environment.

Comment Number: BOEM-2024-0008-0551-0010
Commenter Type: Advocacy Group
Organization: RODA

Comment Excerpt Text:

Under recently adopted regulatory revisions, the National Environmental Policy Act (NEPA) must be approached to fulfill the agency's purpose and need in addition to those of the applicant, and legal history indicates the applicant's desires are secondary considerations to the agency's primary authority [Footnote 7: See 40 C.F.R. 1502.13.]. The purpose of NEPA is "to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; to enrich the understanding of the ecological systems and natural resources important to the Nation." [Footnote 8: 42 U.S.C. 4321.] Typically a purpose and need statement must incorporate this overarching purpose in conjunction with action-specific legislation, which in this case is the Outer Continental Shelf Lands Act (OCSLA). Such an approach is evidenced by BOEM's 5-year plan for oil and gas, which has the stated purpose to implement requirements of OCSLA Sec. 18(a)(3) to "balance the potential for environmental damage, the potential for the discovery of oil and gas, and the potential for adverse impacts to the coastal zone." Following from this correctly framed purpose and need, the 5-year plan then provides a thorough analysis of relevant energy demands and future needs forecasts [Footnote 9: BOEM, Outer Continental Shelf Oil and Gas Leasing Program: 2017-2022 Final PEIS (Nov. 2016) p. 1-2.].
An appropriate purpose and need statement for this action would lead BOEM to prioritize OCSLA and NEPA's focus on environmental safeguards and eliminating damage to the environment. It would not be based on achieving states' OSW goals or the profit goals of a utility company determined outside of the NEPA process, as those would predispose the outcome of environmental review. The NEPA environmental analysis should inform OSW planning and decision making, not the inverse [Footnote 10: This point highlights the need for a Programmatic EIS for the U.S. offshore wind leasing program.]. Regardless, an agency cannot circumvent its NEPA obligations "by adopting private interests to draft a narrow purpose and need statement that excludes alternatives that fail to meet specific private objectives" nor can it "craft a purpose and need statement so narrowly drawn as to foreordain approval of" a project proposed by a private party [Footnote 11: Nat'l Parks & Conservation Ass'n v. Bureau of Land Mgmt., 606 F.3d 1058, 1072 (9th Cir. 2010).].

Comment Number: BOEM-2024-0008-0611-0006
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

Defining proper alternatives starts with the purpose and need for the proposal. A clear purpose and need for a proposed federal action or approval is essential to structure of an EIS, especially the alternatives to that proposal.

This section of the NOI starts with a paragraph about the President's Executive Order #14008 on climate change, and then follows with a paragraph about the proposed project's lease area. But it provides no connection between the two, and in fact prior BOEM EIS Appendices have acknowledged that these projects will have no impact on climate change, so this does not establish the purpose of this exercise.

On page 5 of the NOI, a BOEM purpose does emerge, which is simply whether to approve, modify or disapprove the Atlantic Shores South project Construction and Operations Plan (COP). This may be BOEM management's purpose but it is not a substantive purpose for the country. In addition, it is unclear how an agency can have a purpose with diametrically opposite objectives, either the purpose is to approve or it is to disapprove, but you cannot have both. So this too is not helpful in defining purpose and alternatives.

In fact, the BOEM fails to present any substantive purpose at all, and by doing so deprives itself and the public of any alternative means to accomplish its mission with far less environmental damage. Rather, it just narrows the scope of the EIS only to what the applicant wishes to do and the states have enabled.

But there is real purpose and need here, and there is evidence of that not from the words in the NOI but from BOEM's other statements and actions. Its proposed projects are exactly what the states of New Jersey and New York have approved, and the BOEM has stated in its NEPA policy document that it will consider no alternatives to that. Its EIS approvals follow and mirror directly the state approvals. Although it has no legal obligation to do so, the BOEM has relegated its discretionary authority to the states and has clearly adopted the state decisions as its own. Therefore the BOEM does have purpose here and that is to effectuate the New Jersey and New York state offshore wind decisions.

Comment Number: BOEM-2024-0008-0730-0002
Commenter Type: Individual
Commenter: Elizabeth Raleigh

Comment Excerpt Text:

Further, the countries that have previously Installed wind turbines are in the process now of moving away from wind power as it is not feasible. Without subsidies it is too expensive to even launch. American taxpayers will be on the hook again to pay for these monstrosities. The cost of electricity as stated by your own group will increase significantly. The wind turbines have zero impact on CO2 emissions. If these have no affect on CO2, cost more, and are destroying our ocean and marine life, this makes no sense to continue.

Comment Number: BOEM-2024-0008-0761-0004
Commenter Type: Individual
Commenter: John Deputato

Comment Excerpt Text:

You "claim" to be a responsible steward and allow for inclusive and transparent engagement.

But leasing this area < 9 mile off the coast actually feels quite the opposite.

- it's more "irresponsible.

This will be the closest and largest project to date in terms of size, extreme location to shore and impact on the community.

Comment Number: BOEM-2024-0008-0761-0007
Commenter Type: Individual
Commenter: John Deputato

Comment Excerpt Text:

Did you know that in Europe Wind Farms start at 44 miles off the coast? And none or few are 1,000 ft tall.

This project - as planned - is in direct violation of your mission statement.

Just because you've been given a hammer doesn't mean that every location up and down the coast of NJ is a nail.

You need to be smarter, more skillful, and more responsible.

Comment Number: BOEM-2024-0008-0778-0004
Commenter Type: Individual
Commenter: Prof. Edgar Gunter

Comment Excerpt Text:

The operators of the power grid are slow walking all wind, turbine energy onto the grid because of the energy from wind turbines is not compatible with the synchronous energy developed by stationary turbine generators.
An excessive amount of wind, turbine energy can disrupt the grid and also fail, stationary turbine, generators, and transformers.

Comment Number: BOEM-2024-0008-0799-0001
Commenter Type: Individual
Commenter: Darlene Gossett

Comment Excerpt Text:

This is an outlandish attempt by the government to destroy the coastal community both on land and in the ocean. Studies have shown in Germany and in the deserts of this country that wind turbines do not produce enough electricity to power the community and causes more damage to the environment than it helps the environment.

Comment Number: BOEM-2024-0008-0799-0003
Commenter Type: Individual
Commenter: Darlene Gossett

Comment Excerpt Text:

He ignores the studies that have concluded wind turbines are not the answer to providing a better solution and environmentally sound way to produce energy. This has to be stopped before it is too late.

Comment Number: BOEM-2024-0008-0852-0003
Commenter Type: Individual
Commenter: Sylvia Lockwood

Comment Excerpt Text:

Lastly, of concern is the validity of the "purpose and need" for the Atlantic Shores project as the adjacent New York Bight Vineyard Wind project Final Environmental Impact Statement Appendix A states "Overall, it is anticipated that there would be no collective impact on global warming as a result of offshore wind projects" BOEM as a whole as well as each individual employee may be contributing to the extinction of the North Atlantic Right Whale and the destruction of our ocean environment which supports the basis of life and natural climate change mitigation by allowing these industrial and "for profit" foreign companies to develop projects for nothing. For this and many other reasons that this doesn't provide the space to express, I am vehemently opposed to the issuance of an environmental impact statement at this time and/or ever.

Comment Number: BOEM-2024-0008-0985-0005
Commenter Type: Individual
Commenter: Tony Alexander

Comment Excerpt Text:

Totally unreliable and inefficient energy production

Comment Number: BOEM-2024-0008-1007-0003
Commenter Type: State Government
Organization: New York State

Comment Excerpt Text:

Atlantic Shores proposes to construct and operate the project in Renewable Energy Lease Area OCSA 0549 (Lease Area), which is approximately 81,129 acres and located 8.4 statute miles (mi) (7.3 nautical miles) offshore New Jersey and approximately 60 mi offshore New York State. Atlantic Shores proposes to develop the entire Lease Area, known as the Atlantic Shores North Project (the Project). In addition to the proposed Lease Area development, Atlantic Shores proposes export cable corridors including a Northern Export Cable Corridor (Northern ECC) into New York Waters with subsequent potential New York City landfalls in Brooklyn, New York at Fort Hamilton, Wolfe's Pond, and Lemon Creek and interconnections on Staten Island, New York at Gowanus, Fresh Kills, and Goethals Substations. Atlantic Shores does not yet have an off-take agreement with New York but may bid into a future offshore wind solicitation.

Because of this, New York State (the State or NYS) has congruent and direct interests both in the environmentally responsible development and construction of the Project, as well as in ensuring that potential environmental impacts and effects to the State's diverse ocean economy are analyzed. In addition, New York State has a target of 9,000 MW of offshore wind by 2035, codified in the Climate Leadership and Community Protection Act. These forward-looking clean energy targets are complemented by the State's ongoing commitment to minimizing impacts to ocean uses and resources through the responsible development of offshore wind in the Atlantic Ocean.

Comment Number: BOEM-2024-0008-1028-0021
Commenter Type: Advocacy Group
Organization: BlueGreen Alliance

Comment Excerpt Text:

BGA believes that standards for high-road, equitable, and environmentally responsible development are consistent with federal statute.

Comment Number: BOEM-2024-0008-1028-0022
Commenter Type: Advocacy Group
Organization: BlueGreen Alliance

Comment Excerpt Text:

High road standards touch on many of these imperatives including safety; protection of the environment; conservation of natural resources; protection of national security; fair return to the United States; consideration of other uses; and oversight, inspection, and resource monitoring. Environmentally responsible development, robust stakeholder engagement, equitable distribution of benefits, and attention

to quality job creation domestically are all foundational to OCSLA requirements.

Comment Number: BOEM-2024-0008-1028-0023
Commenter Type: Advocacy Group
Organization: BlueGreen Alliance

Comment Excerpt Text:

President Biden has reinforced in various executive orders that it is the policy of the federal government to pursue solutions to the climate crisis with attention to union labor, domestic manufacturing, environmental justice, and protection of natural resources. The announcement of the national offshore wind target to deploy 30 gigawatts (GW) of offshore wind by 2030 further underscored this approach.

Comment Number: BOEM-2024-0008-1028-0024
Commenter Type: Advocacy Group
Organization: BlueGreen Alliance

Comment Excerpt Text:

President Biden has also emphasized the need to maximize utilization of domestic content as we advance climate and clean energy solutions in order to strengthen U.S. manufacturing. President Biden's executive order on America's supply chains issued February 24, 2021 states, "[t]he United States needs resilient, diverse, and secure supply chains to ensure our economic prosperity and national security." It continues to say, "resilient American supply chains will revitalize and rebuild domestic manufacturing capacity, maintain America's competitive edge in research and development, and create well-paying jobs. They will also support small businesses, promote prosperity, advance the fight against climate change, and encourage economic growth in communities of color and economically distressed areas."

Comment Number: BOEM-2024-0008-1028-0025
Commenter Type: Advocacy Group
Organization: BlueGreen Alliance

Comment Excerpt Text:

It is evident that utilization of domestic content in offshore wind projects is imperative for reaching our federal goals. The March 2022 offshore wind energy supply chain report by the NREL states that supply chain constraints caused by global bottlenecks are one of the greatest risks for achieving our national offshore wind goals.[Footnote xi: NREL, The Demand for a Domestic Offshore Wind Energy Supply Chain, January 2022. https://www.nrel.gov/docs/fy22osti/81602.pdf.]The modeling in the report also shows that average and maximum job creation utilizing 25% domestic content versus 100% domestic content in offshore wind projects results in a difference of approximately 30,000-40,000 jobs from 2023-2030.[Footnote xii: Ibid.]In addition, across renewables, even a modest increase in manufacturing produces an additional 45,000 good manufacturing jobs per year and an additional $5 billion in wages through the 2020s, as the United States continues greening its electricity grid.

Comment Number: BOEM-2024-0008-1028-0026
Commenter Type: Advocacy Group
Organization: BlueGreen Alliance

Comment Excerpt Text:

Recent global events have made it abundantly clear that our national security is strongly tied to our energy security, to which domestic manufacturing plays a critical role.

Comment Number: BOEM-2024-0008-1028-0027
Commenter Type: Advocacy Group
Organization: BlueGreen Alliance

Comment Excerpt Text:

Strengthening the nation's supply chains can result in environmental benefits as well. Energy intensive manufacturers in the United States are relatively clean compared to competitors.

Comment Number: BOEM-2024-0008-1109-0002
Commenter Type: Advocacy Group
Commenter: Marlene Asselta
Organization: Southern New Jersey

Comment Excerpt Text:

We believe the proposed investments are consistent with SNJDC's mission to promote responsible economic development in South Jersey by recognizing that clean energy infrastructure is the cornerstone to economic success across the region.

Comment Number: BOEM-2024-0008-1137-0001
Commenter Type: Advocacy Group
Commenter: William Link
Organization: John Birch Society

Comment Excerpt Text:

Now, there are other questions. Number one why are they so stuck on wind turbines when there are other ways of wind power. There is something called the vortex bladeless that has developed in Spain which has zero moving parts, it's a stick that sticks up in the air and vibrates with the wind and at the very bottom of that is where the turbine is, very easily accessible.

Comment Number: BOEM-2024-0008-1137-0004
Commenter Type: Advocacy Group
Commenter: William Link
Organization: John Birch Society

Comment Excerpt Text:

So I am totally against them, there are much better ways, in fact our own college, Princeton, one of the greatest colleges of all, has worked with other colleges in developing nuclear fusion. Unlike nuclear fission, nuclear fusion has no waste, they are a few years down the road of developing this on a mass scale which could in fact power the entire state and that is the way we should be going. We should be

looking at sustainable nuclear fusion and not wind.

Comment Number: BOEM-2024-0008-1148-0004
Commenter Type: Individual
Commenter: Patricia Robertson

Comment Excerpt Text:

Let the new technology guide you and until then, I urge you, please, do no harm to our oceans. We get one coastline and it is irreplaceable and it is undoubtedly the single greatest asset of the State of New Jersey. Let's use that technology to help us find the best alternatives. Let's not have to rely on technology to eventually figure out how to clean it up as other options become clearer and better developed, and certainly let's not have to rely on technology or AI to show our children what a natural horizon looks like.

Comment Number: BOEM-2024-0008-1172-0002
Commenter Type: Advocacy Group
Commenter: Carl Van Warmerdam
Organization: Deep Sea Defenders

Comment Excerpt Text:

So we are kicking the problem down the road and these are -- they are not -- their purpose and need has all been mandated. It's not that they will work because BOEM itself knows that they will not work to alleviate climate change. They will in fact exacerbate it.

So that's the number one, so their function is pretty much useless except to damage the environment.

Comment Number: BOEM-2024-0008-1178-0001
Commenter Type: Advocacy Group
Commenter: Paulina O'Connor
Organization: New Jersey Offshore Wind Alliance

Comment Excerpt Text:

want to thank Atlantic Shores for their work on the proposed project and I am in full support of it. Offshore wind developers adhere to high standards of project development and construction. They navigate complex regulatory and compliance frameworks and undergo meticulous evaluations by various agencies. Atlantic Shores and its staff is dedicated to New Jersey and its success in combatting climate change. I encourage all to embrace the project and support its development.

This project and others like it will be critical components of the state's clean energy transition and the offshore wind industry. They will create good paying jobs and ensure accessible to all economic opportunities while providing good and sustainable and secure energy.

A.3.23 Sea Turtles

Comment Number: BOEM-2024-0008-1069-0019
Commenter Type: Advocacy Group
Organization: Clean Ocean Action

Comment Excerpt Text:

Species that prefer warmer water, such as sea turtles, may be attracted to the warm water surrounding the outflow area, which can change the composition of the marine community.

Comment Number: BOEM-2024-0008-1070-0022
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Sea Turtles
Six sea turtle species, all of which are either threatened or endangered under the ESA, may migrate through the Project Area; the COP lists the loggerhead and leatherback turtles as "common", the green and Kemp's ridley as "uncommon", and the hawksbill sea turtle as "rare". [Footnote 43: Atlantic Shores North Construction and Operations Plan, Volume II: at 4-260.] Many of the mitigation measures and issues discussed above and in Attachment 1 will accrue protections and better understanding of risk to sea turtles and we recommend BOEM require Atlantic Shores North to implement them.

Comment Number: BOEM-2024-0008-1070-0023
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Given that the ability to detect sea turtles during aerial surveys is highly variable, increased investment in tagging and tracking studies[Footnote 44: See, e.g., Dodge, K.L., et al. Id.; Dodge, K.L., Galuardi, B. and Lutcavage, M.E., "Orientation behaviour of leatherback sea turtles within the North Atlantic subtropical gyre," Proceedings of the Royal Society B, vol. 282, art. 20143129 (2015); Winton, M.V., Fay, G., Haas, H.L., Arendt, M., Barco, S., James, M.C., Sasso, C., and Smolowitz, R., "Estimating the distribution and relative density of satellite-tagged loggerhead sea turtles using geostatistical mixed effects models," Marine Ecology Progress Series, vol. 586, pp. 217-232 (2018).] would complement data collected via aerial surveys and provide a more complete picture of sea turtle occurrence and habitat use in the region.

Comment Number: BOEM-2024-0008-1070-0024
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Increased sea turtle tagging and tracking studies are needed to better understand movement, dive patterns and surface time, and habitat use which can, among other uses, help advise monitoring and avoidance, minimization, and mitigation strategies and generate more accurate estimates of sea turtle takes.

Comment Number: BOEM-2024-0008-1070-0025
Commenter Type: Advocacy Group
Organization: National Wildlife Federation et al.

Comment Excerpt Text:

Satellite telemetry data are available from rehabilitated and released Kemp's ridley and green turtles[Footnote 45: Robinson, N.J., Deguzman, K., Bonacci-Sullivan, L., DiGiovanni Jr., R.A., and Pinou, T., "Rehabilitated sea turtles tend to resume typical migratory behaviors: satellite tracking juvenile loggerhead, green, and Kemp's ridley turtles in the northeastern USA," Endangered Species Research, vol. 43, pp. 133-143 (2020); New England Aquarium, unpublished data.] that suggest rehabilitated turtles are a good proxy for wild-caught turtles. Considering the costs and probably limited success rate of in-water tagging work for these three species, acoustic telemetry of rehabilitated turtles may also be an effective means of gathering useful data.

A.3.24 Scenic and Visual Resources

Comment Number: BOEM-2024-0008-0005-0004
Commenter Type: Individual
Commenter: James Binder

Comment Excerpt Text:

New York State through NYSERDA has concluded from a visibility study it conducted several years ago that windmills should not be constructed within 20 miles of the shore to avoid negative visible impacts. Consider that this 20 mile limit was with smaller and shorter turbines than the Proposed Action. The proposed project is as close as 9 miles offshore with turbines over 1000 feet in height. Why does BOEM have a lesser visibility threshold for wind projects than New York State? Why should the residents and visitors to LBI be subjected to an impairment of its currently unimpeded ocean views? Please justify your position for not requiring windmills to be placed no closer than 20 miles to shore.

Comment Number: BOEM-2024-0008-0053-0003
Commenter Type: Individual
Commenter: Ben Vitale

Comment Excerpt Text:

Aesthetics are in the eye of the beholder. But windmills, even modern ones, and wind farms, can actually be quite beautiful. Also, at 10 - 20 miles off the coast, they will be barely visible in most conditions.

Comment Number: BOEM-2024-0008-0071-0001
Commenter Type: Individual
Commenter: Doreen Pavese

Comment Excerpt Text:

I am not in favor of this project so close to our shores. Nowhere else will the view of our precious ocean be marred with what can only be caused an eyesore. When these fail they are horrible for the environment.

Comment Number: BOEM-2024-0008-0081-0002
Commenter Type: Individual
Commenter: Patrick Cozza

Comment Excerpt Text:

Why is this proposal BY FAR THE CLOSEST TO THE SHORELINE at 8 miles, compared to EVERY other wind project in the US??? Again, of course we know, it's less expensive for the developer, as costs continue to rise.

Comment Number: BOEM-2024-0008-0081-0003
Commenter Type: Individual
Commenter: Patrick Cozza

Comment Excerpt Text:

A 1,048 foot turbine, the largest in the country, will be easily seen from the NJ coastline, ruining the beauty of the shoreline, the ocean and the tourism of the NJ shore.

Comment Number: BOEM-2024-0008-0138-0035
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

The description of the Visibility Impact Study as presented below is inconsistent and in direct conflict with the Brigantine Master Plan.

Comment Number: BOEM-2024-0008-0138-0036
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

The visual impact of the stationary turbines is just part of the impact to the shore. The physiological impact of any prolonged view of the rotation is unclear, but because of the disparity between what the brain expects to see at the seashore and the actual view, it could cause visible induced vertigo or other effects.

Comment Number: BOEM-2024-0008-0138-0004
Commenter Type: Advocacy Group
Organization: Defend Brigantine Beach Inc., and Downbeach

Comment Excerpt Text:

The project creates a dominant visual effect on a viewer, amplified by the rotating blades which may cause beach goers to turn away. The COP fails to address the impact of the blade rotation; stationary turbines use inappropriate visibility frequency data from an inland site.

Comment Number: BOEM-2024-0008-0434-0001
Commenter Type: Individual
Commenter: Richard Van Fleet

Comment Excerpt Text:

I am against the Atlantic Shores turbine project. I own a home on Long Beach Island. The turbines will be visible from my house and at night will have blinking lights which will destroy the natural beauty of living on LBI.

Comment Number: BOEM-2024-0008-0488-0001
Commenter Type: Individual
Commenter: Colleen D'Abbene

Comment Excerpt Text:

. With wind turbines so close to shore, our ocean will be an ugly, industrialized view. No longer will we and our extended family and friends enjoy the peaceful tranquility of nature that brought us here originally. The pristine environment will be ruined by this plan to place one of the closest to shore and most densely clustered wind turbine plants on the east coast.

Comment Number: BOEM-2024-0008-0489-0001
Commenter Type: Individual
Commenter: j. m.

Comment Excerpt Text:

Your current plan will ruin the beauty of Long Beach Island and cause financial loss to many.

Comment Number: BOEM-2024-0008-0492-0001
Commenter Type: Individual
Commenter: Daryl Jakucs

Comment Excerpt Text:

Leave our glorious ocean alone. Don't ruin it's beauty b

Comment Number: BOEM-2024-0008-0538-0008
Commenter Type: Individual
Commenter: Mary Smith

Comment Excerpt Text:

The EIS states that these turbines will be visible during the day and will have flashing lights at night - America the beautiful is being destroyed.

Comment Number: BOEM-2024-0008-0557-0009
Commenter Type: Individual
Commenter: Joseph Pallante

Comment Excerpt Text:

and destroy even the pristine ocean horizon.

Comment Number: BOEM-2024-0008-0559-0002
Commenter Type: Individual
Commenter: Gina Cobianchi

Comment Excerpt Text:

I read a quote by Governor Murphy (whom I voted for....) to the effect of Too bad for the whiny/spoiled beach home owners who are worried about their views.What!?!? That is incredibly ignorant, shortsighted and insulting.
Has he even spent any time on LBI!?For those of us who are life-long NJ residents (which he is not...) are immensely proud of the massive clean up effort that has taken place since the 60s and 70s when NJ beaches were a filthy joke. Why would we compromise this unique, barrier island beauty for unproven outcomes that may only benefit a few??

Comment Number: BOEM-2024-0008-0560-0002
Commenter Type: Individual
Commenter: ArleneArlene Mangin

Comment Excerpt Text:

People do not go to the shore to look at an industrialized ocean, we come for the beauty.

Comment Number: BOEM-2024-0008-0562-0003
Commenter Type: Individual
Commenter: James Ulrich

Comment Excerpt Text:

Furthermore, the aesthetic beauty of our coastal landscapes will be irreversibly altered by the presence of industrial-scale wind farms. The serene ocean views that many of us cherish will be marred by towering turbines, disrupting the natural harmony of the environment and detracting from the recreational and tourism value of the area.

Comment Number: BOEM-2024-0008-0569-0002
Commenter Type: Individual
Commenter: Craig Osten

Comment Excerpt Text:

The turbines under consideration off the coast of LBI are the largest in the history of wind power. They have not been used or had any serious testing. They are the closest to the shore of any wind project in the world that I am aware of. This will not only have a negative visual impact on those coming to our shore and howe owners but will also impact wildlife who use this area of the coast to migrate

Comment Number: BOEM-2024-0008-0569-0007
Commenter Type: Individual
Commenter: Craig Osten

Comment Excerpt Text:

All visual representations including those in the studies indicate the turbines will be visible from our shore.

Comment Number: BOEM-2024-0008-0581-0001
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

We are avid boaters in the northeast and the proposed and current turbines are in the waterways we frequent. 1. They are hideous and ruin the visual beauty of our oceans.

Comment Number: BOEM-2024-0008-0581-0007
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

but many are losing the beauty received from their visual display ruined,

Comment Number: BOEM-2024-0008-0582-0001
Commenter Type: Individual
Commenter: Mark Cremonni

Comment Excerpt Text:

and the turbines themselves are plain ugly, ruining the treasure of the Jersey Shore if constructed within site of the beaches.

Comment Number: BOEM-2024-0008-0585-0001
Commenter Type: Individual
Commenter: Mark Weismiller

Comment Excerpt Text:

The turbines will ruin the views off of the NJ shore given that they will be located too close to shore and visible day and night. At night, it will look like Newark airport with their blinking red lights.

Comment Number: BOEM-2024-0008-0588-0004
Commenter Type: Individual
Commenter: Kassandra Funkhouser

Comment Excerpt Text:

This project is planned closest to shore at only 8.4 miles, us locals and Jersey shore visitors alike will not only see but hear these monstrosities, what will that do to our economy, our mental and physical health?

Comment Number: BOEM-2024-0008-0599-0005
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

Project structures above the water could affect the visual character defining historic properties and recreational and tourism areas.

Comment Number: BOEM-2024-0008-0611-0022
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

Visible Frequency. Along with that, this EIS should dispense with the misleading presentations in prior visible effect appendices, regarding the frequency at which turbines will be visible. Previous presentations have dishonestly relied on a meteorological study done onshore near Atlantic City airport with an undefined measure of "visibility" that has no bearing on the visibility of 1000 foot-high structures in the open ocean. To his credit, a BOEM staff person in the April 16th virtual scoping meeting seemed to acknowledge that this study is not appropriate. But then that begs the question why BOEM continues to accept its inclusion in the COP. The COP is read by and misleads many. Reference to this study and its results should be removed from the COP and the subsequent EIS.

Comment Number: BOEM-2024-0008-0611-0023
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

Visible Renditions: Full View, Observation Points & Conditions. The COP is not presenting complete visible renditions in terms of the number of turbines observable. For example, with regard to the observation point BHB03, from Holyoke Ave in Beach Haven, it is showing 205 turbines when 732 will actually be visible. All these renditions should be corrected. The EIS should also present full visible renditions from Ship Bottom and Love Ladies, New Jersey. It should not cherry pick the one time of day which shows the least impact. It should also dispense with the visible renditions under cloudy and hazy conditions. That is not consistent with its project design envelope approach to be conservative in its presentations, nor is it representative of summer conditions on Long Beach Island.

Additional deficiencies in the visible impact presentation appear in the Atlantic Shores North Construction and Operations Plan, that should not be carried over in to the draft EIS. These are provided in Enclosure IV. These deficiencies should also be corrected or removed from the COP itself.

Comment Number: BOEM-2024-0008-0611-0024
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

Blade Rotation. We note for the first time that the COP presents an animation of rotating blades. The EIS should make that animation more accessible and discuss the physiological reaction to watching it because it appears to force the viewer to turn away from the seascape. Going to the shore and being unable to look

at the seascape would mark the end of the shore going experience, and this needs to be fully disclosed.

Comment Number: BOEM-2024-0008-0611-0047
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

All simulations should show time of day some do and some don't. See for example LBT 03 the Beach near the LBI Foundation. Otherwise the viewer cannot understand how to differentiate the 3. Note that the 3rd view on page 68 is so different from the other 2 that it seems incredible.

Comment Number: BOEM-2024-0008-0611-0048
Commenter Type: Advocacy Group
Organization: Save Long Beach Island, Inc.

Comment Excerpt Text:

Section 3.4 Atmospheric Influences on Project Visibility page 29. This section should be eliminated or substantially revised. It is based on a very questionable "Rutgers" study and unfortunately that misleading study is then used throughout the COP (including the photo simulations) to estimate times of reduced visibility. All those results are questionable. Also note the comment following this one where the COP specifically notes that the only accurate method of prediction is through on site sampling and on-site observation which was not done to validate the Rutgers modeling.

The referenced Rutgers study was done by two individuals who are no longer at Rutgers, and has noteworthy inconsistencies and unsupported claims (the report itself even cautions about the latter). Rutgers, when we asked about it, was not willing to stand behind that work. It was not peer reviewed or generally published, but done for Atlantic Shores. It is not included in the references to this Appendix. If it is to be used then it should be peer reviewed and made available to the public. Also the study was dated April 2021, yet in this section it is referred to as ENR 2023, that should be clarified.

The DEIS should not include any specific predictions of visibility frequency unless they have field measurements that support the assertions.

Comment Number: BOEM-2024-0008-0622-0001
Commenter Type: Individual
Commenter: Anne Muller

Comment Excerpt Text:

While I support clean, and green energy initiatives, offshore wind and the destruction of of the coast off New Jersey is not clean or green. This is my statement of dissent against the proposed Atlantic Shores project. Foremost, the combined Atlantic Shores projects would place up to 300 massive wind turbines 8.7 miles off the New Jersey coast. This unsightly, industrialization off of coastal communities will be the end of tourism, that the affected coastal communities need to survive. As with other projects that BOEM has changed the offshore distant from the coast, the same should be applied to the Atlantic Shores project to mitigate the visual impact and the impacts to tourism. Changing the distance is the only concession as a coastal resident that I can concede to.

Comment Number: BOEM-2024-0008-0653-0001
Commenter Type: Individual
Commenter: Michael Devlin

Comment Excerpt Text:

The visual impact of the WTGs
The visual simulations produced by BOEM are noted to be severe environmental impacts. This severity of the visual impact can be eliminated or mitigated by implementing the following recommendations:
1. Evaluate alternative locations farther offshore and reduce the overall height of the WTGs. Develop a process for evaluation lease areas further offshore and with lower WTG heights, notably in the OCS-A areas 0541, 0542, 0539 and 0538 leasing areas. This methodology/process would necessarily include the creation of a series of visual simulations of the proposed WTGs for the OCS-A areas 0541, 0542, 0539 and 0538 for comparison purposes to the visual simulations done for the 0549 area.

Produce the visual simulations for WTGs of several heights and several locations offshore.
Recommended heights would be the same height as those off the coast of Martha's Vineyard, 248 meters (813 feet) high and the heights proposed by the current design envelope of 312 meters (1024 feet).
Locations would be for the OCS-A leased areas noted above. Allow for public review so a comprehensive side by side comparison can be made.
Conduct a comprehensive survey of those most impacted by the visual impact of the WTGs so BOEM can get a true picture of the public acceptance of leased locations. This will allow for better decision making wrt location and height of proposed WTGs by providing a direct comparison to alternative locations and heights of WTGs as well as proximity to shore locations. In support of this recommendation as a new data point I asked approximately 40- 50 people who live in Ocean County either on LBI or who frequent LBI by asking for reactions to the visual simulation photos produced by BOEM. The visual impact was deemed severe and outside the range of sensibility to all surveyed.

Comment Number: BOEM-2024-0008-0658-0001
Commenter Type: Individual
Commenter: Darlene Mayser

Comment Excerpt Text:

These wind farms will forever change and obstruct the view off the New Jersey shore and impact the natural landscape. It will become an eyesore for residents and visitors.

Comment Number: BOEM-2024-0008-0711-0004
Commenter Type: Individual
Commenter: allen magrini

Comment Excerpt Text:

III. VISABILITY

3.3.1 Theoretical Visibility of the Turbine Blade Tip

The blade tip viewshed analysis, run at a height of 1046.6 ft shows:
- the turbines visible for 45.7 miles over the open water. The ASN turbines are proposed at 8.4 miles off the LBI shore.

5.5.2 Impacts to Viewers

- studied 31 KEY OBSERVATION POINTS ("KOP") from Asbury Park south to Stone Harbor Point

- 16 or 52% of the locations were found "The Project would result in major visual impacts
- 5 or 16%would have moderate visual impcts
- therefore the project would have a combined major and moderate

negative visual impact on 68%of the locations Comments/Questions:

1. On what basis can BOEM find or justify the proposed turbine design and location where by ASN own analysis and admission have a major visual impact on over half, 52%, of the KOP's Studied? Please provide details and justifications.
2. On what basis can BOEM find or justify the proposed turbine design and location where by ASN own analysis and admission have a major and moderate visual impact on over half, 68%, of the KOP's Studied? Please provide details and justifications.
3. On what basis can BOEM justifly or deem consistent this level of negative visual impacts on 68% of the KOP's studied of the required Environmental Justice mandates?

Comment Number: BOEM-2024-0008-0711-0005
Commenter Type: Individual
Commenter: allen magrini

Comment Excerpt Text:

IV. Inconsistencies between Ship Bottom Visual Imact Analysis:

By way of example, a review of the findings between the ASN and Atlantic Shores South ("ASS") Projects as presented by Atlantic Shores and allowed by BOEM identifies significant inconsistencies between the findings of the two projects.

1. Ship Bottom results from Atlantic Shores NORTH Report
- 8.4 miles to nearest turbine
- the Project presents strong line and form contrasts with the
ocean. At times, particularly during the morning, color contrast will also be strong. Motion and lighting will draw viewer attention strongly during high visibility conditions.

2. Ship Bottom results from Atlantic Shores SOUTH Report
-18.2 miles to nearest turbine
-The quantity and placement of the turbines creates an industrial feel to the view. The turbines substantially alter the character of the landscape." With the Project in place, this view becomes modified and significant visual impacts result
from the Projects,

A comparative reading of these findings and conclusions would lead you to believe that the negative impact of the turbines on the Ship Bottom Beach is significantly worse from the ASS report. These findings can only lead one to the illogical conclusion that the closer the turbines are to the shore the less visible they become. This just does't make any sense.

Need to inspect the accuracy of the Visualizations presented in the ASN report.

- Ship Bottom - Turbines closest to shore at 8.4 miles
- Others views presented where turbines further out, Island Beach State Park at 11.73 miles, and Beachfront at Barnegat at 10.70 miles, in both instances the turbines appear larger.
How is that possible?

Comments/Questions:

1. How is it possible that in Ship Bottom where the turbines are closest to shore, they appear to look smaller than those at other locations where the turbines are further from the shore line.

2. Piecemeal presentations for each of the Atlantic Shore projects results in inconsistent and conflicting information. BOEM should require a cumulative visual analysis that would include all Atlantic Shore projects in a complete and comprehensive presentation.
3. How is it possible that the impacts on Ship Bottom and other locations, as presented in the reports, are worse when the turbines are further further away?

Comment Number: BOEM-2024-0008-0761-0003
Commenter Type: Individual
Commenter: John Deputato

Comment Excerpt Text:

To quote directly from Atlantic Shores documents relative to historic Beach Haven; "Turbines will dominate the view and residences along the shoreline will have a consistent view of the ocean that is industrialized."

So, is it BOEM's plan to turn this pristine Island's view into the NJ Turnpike?

Comment Number: BOEM-2024-0008-0761-0006
Commenter Type: Individual
Commenter: John Deputato

Comment Excerpt Text:

Why would you entertain a proposal for 1,000 ft turbines, the size of Chrysler buildings with red blinking lights that will change the coast view forever.

Comment Number: BOEM-2024-0008-0805-0002
Commenter Type: Individual
Commenter: Christine Fritsch

Comment Excerpt Text:

After listening to your 4/3/24 I submitted a question on 4/16/24. Mr Kirby stated that during scoping of the project in 2010-2012; feedback from "shareholders" was solicited. My question is that who was on the island in 2010 asking homeowners if an industrialized view from the entire horizon of LBI was a good idea. It is wrong to disrupt the natural beauty of New Jersey coastline for an industry that over promises and underdelivers.
Sadly, if this project progresses as planned only 8 miles from the coast, LBI will be fundamentally changed forever from peaceful a haven of respite for its residents and visitors to another eyesore on the parkway. Since Governor Murphy insists OSW will only be specs on the horizon, I suggest Atlantic Shores take their turbines to his beach in Rumson better yet put them in Delaware.

Comment Number: BOEM-2024-0008-0805-0003
Commenter Type: Individual
Commenter: Christine Fritsch

Comment Excerpt Text:

What it comes down to for me as a homeowner is the visual impact;157 turbines 1,000 foot tall 8 miles from the coast will destroy the view. When you come over the bridge to LBI the Atlantic City skyline that

is 30 miles away and 700 ft tall is clearly visible. A 1,000 foot tall turbine at 8-12 miles will be highly visible not be a dot on the horizon. When I attended the BOEM in Manahawkin I spoke at length with William Waskes about the visual impact of Atlantic Shores. He was in agreement with the Atlantic Shores Construction Plan that the visual degradation would be great. The view of key observation point BH801 pg108 and BH802 on page 121 says it all; this is a factory planned for the ocean.

Comment Number: BOEM-2024-0008-0808-0001
Commenter Type: Individual
Commenter: Dennis De Forest

Comment Excerpt Text:

Visual impact:Offshore wind turbines are massive structures that will significantly alter our ocean views.the serene beauty of our coastline will be marred presence industrial installations, affecting both residents and tourists

---

Comment Number: BOEM-2024-0008-0838-0001
Commenter Type: Individual
Commenter: Kenneth Jones

Comment Excerpt Text:

Do not, under any circumstances, continue with this project. It's s blight on the landscape

---

Comment Number: BOEM-2024-0008-0859-0003
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

, horrible to look at

Comment Number: BOEM-2024-0008-0862-0002
Commenter Type: Individual
Commenter: MARY SHAPPELL

Comment Excerpt Text:

The impact on our coast, our Long Beach Island is immeasurable, and this unsightly blight will in no way benefit anyone except the developers.

Comment Number: BOEM-2024-0008-0904-0002
Commenter Type: Individual
Commenter: Andrew Coskey

Comment Excerpt Text:

It will also greatly impact life at the jersey shore.

Another thing that nobody talks about is how people come to the ocean for mental health, knowing that there is nothing out there. If the ocean become permanately industrialized, I believe this will effect mental

health and has the potential to raise suicide rates. I could be wrong, this is my opinion. Again I am deeply opposed to offshore wind farms.

Comment Number: BOEM-2024-0008-0962-0004
Commenter Type: Individual
Commenter: Barbara Sommer

Comment Excerpt Text:

Moreover, I am concerned about the visual impact of the turbines on the landscape, especially considering their proximity to the shore at only 8 miles out when all other NJ shore wind farms are much further out to sea (i.e. 40 miles). Why were ours sited so close to shore?!

Comment Number: BOEM-2024-0008-0974-0006
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

Not to mention they're ugly, and nobody wants to to look at them.

Comment Number: BOEM-2024-0008-0999-0003
Commenter Type: Individual
Commenter: Alissa Kanowitz

Comment Excerpt Text:

In addition, the night sky will glow red over the entire island.

Comment Number: BOEM-2024-0008-1003-0002
Commenter Type: Individual
Commenter: Margaret Bagley

Comment Excerpt Text:

Additionally, the visual impact of offshore wind farms on our coastal landscape cannot be ignored. These structures can alter the natural beauty of our shores, potentially affecting tourism and local property values. We must carefully weigh the aesthetic consequences of such developments against their purported benefits.

Comment Number: BOEM-2024-0008-1029-0008
Commenter Type: Individual
Commenter: Douglas Crawford

Comment Excerpt Text:

Your visual simulations continue to downplay the appearance of the wind farms from the shore. With Ocean Wind, you failed to show the appearance from the prime beaches. For Atlantic Shores, you show mostly views of seascapes as if shot with a very wide perspective, as if shot by a camera with a very wide-angle lens. Though lovely images, they hide the reality of the imposing appearance of the turbines by pushing the turbines out far on the horizon.

In some cases, I understand you have errors in the simulated heights of the turbines. Errors like this are unacceptable. All visuals should honestly show the view of properly sized 1000'+ turbines from the perspective with absolutely correct metrics.

Comment Number: BOEM-2024-0008-1029-0009
Commenter Type: Individual
Commenter: Douglas Crawford

Comment Excerpt Text:

You have relied on old opinion surveys to judge the public's reaction to the visual impacts of the wind farms. These surveys were based on old visuals when the turbine sizes were smaller and there were attempts to scale their responses to simulate closer and larger turbines. But this is a poor showing. The visuals that were actually shown to the people are difficult to find. New surveys should be done to accurately capture peoples reaction to updated for people's opinions of the views from images corrected as above.

[See original attachment for photos]

This is evidence of the REAL look of 1000' turbines.

[See original attachment for photo]

Comment Number: BOEM-2024-0008-1040-0001
Commenter Type: Individual
Commenter: Denise Boccia

Comment Excerpt Text:

Atlantic Shores continues to make specific claims about reduced visibility for certain times and percentages of the year based on an old draft study attributable to Rutgers. Has BOEM had that study peer reviewed? Does Rutgers itself stand by that draft effort by people who are no longer at Rutgers?

Comment Number: BOEM-2024-0008-1040-0003
Commenter Type: Individual
Commenter: Denise Boccia

Comment Excerpt Text:

The AS North COP includes visual simulations from certain on shore locations, but omits a full treatment for 2 of the closest venues - Ship Bottom and Loveladies. Why only one low sun condition for those critical sites, when more times of the day versions are offered for other locations? Can we get complete treatment of those 2 sites?

Comment Number: BOEM-2024-0008-1043-0008
Commenter Type: Local Government
Organization: Borough of Sea Girt, NJ Planning Board

Comment Excerpt Text:

A Concern regarding the potentially adverse aesthetic impact of the proposal

Comment Number: BOEM-2024-0008-1075-0001
Commenter Type: Individual
Commenter: dr michael dickman

Comment Excerpt Text:

I have been advised that there is a proposal to construct windmills of shore in LBI where I have my vacation home. I want to go on record as insisting that they be placed no closer than 35 miles from the shore. These structures are unsightly and their placement in close proximity to the beach would lessen my chance to rent the property orsell it later. We chose this island because because if its a beautiful spot and our view out into the ocean is totally unobstructed.

Comment Number: BOEM-2024-0008-1083-0002
Commenter Type: Local Government
Organization: Borough of Sea Girt, New Jersey

Comment Excerpt Text:

Sea Girt takes great pride in its picturesque coastal beauty, a cornerstone of our identity. Our pristine beaches and scenic views attract visitors, supporting our local economy and enhancing our residen ts' quality of life. Introducing offshore wind turbines near our shores threatens to mar this natural beauty, potentially deterring tourists and residents from enjoying the serene attractiveness of our coastal town.

Comment Number: BOEM-2024-0008-1104-0001
Commenter Type: Individual
Commenter: Athena Clark

Comment Excerpt Text:

New Jersey does not have a great reputation for beauty. I moved to Cape May 30years ago from Manhattan and never stopped telling people about the beautiful beaches, fishing, dolphins and resort life. Once this industrial park gets built into the ocean, NJ will truly be the armpit of the east coast. An inefficient eyesore,

Comment Number: BOEM-2024-0008-1104-0003
Commenter Type: Individual
Commenter: Athena Clark

Comment Excerpt Text:

Murphy and everyone involved will be remembered and enshrined for decades for this blight

Comment Number: BOEM-2024-0008-1105-0004
Commenter Type: Federal Agency
Commenter: Jennifer Maver
Organization: National Park Service

Comment Excerpt Text:

NSP recommends the VIA assess the turbines under different lighting (including times of day, night, and seasons) and atmospheric conditions, their movement, nighttime lighting (both for aircraft and watercraft, direct and ambient) and include other related project equipment such as electric transmission substations

that may be located near or along the shore. Based on our initial review, it appears the visual simulations included in the VIA may not represent the full spectrum of visibility under certain lighting conditions, and therefore the WTGs may be more visible at certain times of day from certain locations than presented.

Comment Number: BOEM-2024-0008-1105-0007
Commenter Type: Federal Agency
Commenter: Jennifer Maver
Organization: National Park Service

Comment Excerpt Text:

In general, NPS recommends the following beneficial measures protective of night skies.
- Security lighting should be directed downward and shielded. Some lights should have motion sensors added.
- Control lights should be off when not needed. This applies to both the construction phase and operation phase.
- Brightness the minimum lumen output needed should be used.
- Warm color-temperature light use amber lights, when possible, instead of white light.

Comment Number: BOEM-2024-0008-1105-0008
Commenter Type: Federal Agency
Commenter: Jennifer Maver
Organization: National Park Service

Comment Excerpt Text:

NPS appreciates the intended utilization of an Aircraft Detection Lighting System (ADLS) to turn the aviation obstruction lights on and off in response to detection of nearby aircraft due to its enhanced protection of dark night skies. We would also appreciate estimates of the duration of use and percent of time lights will be activated, based on current airspace use, to help evaluate the ability of ADLS to mitigate impacts from lighting. For the offshore component, we request visual simulations for both static images and light-flashing animation at night from multiple KOPs. Please consult with New Jersey SHPO on historic properties that would be sensitive to night lighting and most appropriate as KOPs.

Comment Number: BOEM-2024-0008-1112-0007
Commenter Type: Local Government
Organization: Sea Girt New Jersey

Comment Excerpt Text:

A Concern regarding the potentially adverse aesthetic impact of the proposal;

Comment Number: BOEM-2024-0008-1117-0001
Commenter Type: Individual
Commenter: Penny Applegate

Comment Excerpt Text:

The spoiled natural visuals while sitting at the beach and looking at the sunrise and ocean horizons is abhorrent. We do not build on public parks for this very reason.

Comment Number: BOEM-2024-0008-1144-0001
Commenter Type: Individual
Commenter: Leslie Listwa

Comment Excerpt Text:

The only thing I want to bring up, I was looking at some of the images that were presented over the last couple of days over what LBI will look like and Barnegat Light State Park which everybody in New Jersey really enjoys and appreciates, we were originally told this was going to be a speck on the horizon, if you look at the images, it's really just horrible.

As an engineer, all engineering is compromised, compromise in terms of efficiency, cost and satisfying the customer. We are the customer so I am -- I am asking for a compromise. Why does it have to be eight miles out, obviously because there is some cost savings and maybe that needs to be looked as it's being looked at in other states as well and push it out 30, 40 miles so we can still enjoy the shore, enjoy our state, enjoy Barnegat Light.

Comment Number: BOEM-2024-0008-1150-0005
Commenter Type: Individual
Commenter: Laurie Maxwell

Comment Excerpt Text:

I would also like to have a third-party that looks at all of these factors and let's talk about tourism, let's talk about the visual impact.

The New Jersey shore, people spend their money, it's a tourist attraction. And to look out 8.4 miles, I mean I guess the issue is first it was why does it -- this will be the closest turbine farm anywhere, why does it have to be 8.4 miles. Why can't it be further out? It makes absolutely zero sense.

Comment Number: BOEM-2024-0008-1163-0003
Commenter Type: Individual
Commenter: Elaine Furda

Comment Excerpt Text:

People do not want to go to the beach, which is their happy place, and look at turbines. I believe the view will be disastrous.

Also, the view at night, when a plane flies over the turbines, there will be flashing red lights which, will also affect the beautiful view of our coastline, stars and just the scope of the whole horizon.

Comment Number: BOEM-2024-0008-1163-0005
Commenter Type: Individual
Commenter: Elaine Furda

Comment Excerpt Text:

The Atlantic Shore project is too close to the land, at only 8.4 miles out at its closest point, and is three times the size of the Statue of Liberty. These turbines need to be moved out further from the land where they cannot be seen!

Comment Number: BOEM-2024-0008-1166-0002
Commenter Type: Individual
Commenter: Nancy Donovan

Comment Excerpt Text:

We have beautiful beaches on the New Jersey Shore, nicer even than Hawaii, as far as I'm concerned.

There are so many people that go there with their families to enjoy the beautiful New Jersey Shore, and it's going to be destroyed with the visual impact.

Comment Number: BOEM-2024-0008-1183-0002
Commenter Type: Individual
Commenter: John Breitling

Comment Excerpt Text:

The turbines are going to be about 1,000 feet tall. On April 9, 2021, I virtually attended the Beach Haven Tax Payers Association meeting. Among the people on the panel were two representatives from Atlantic Shores Jessica Dealy and Doug Copeland. During the meeting Jessica Dealy said Atlantic Shores was planning to install as many as possible of the largest wind turbines available in this location eight miles off LBI. This adds up to hundreds of the largest 1,000 foot tall turbines starting at an area eight miles off the beach.

She also said that the turbines will be concealed by a marine layer of humidity mist and fog. On LBI we have some fog in the spring when the waters are cold but usually we have good visibility especially in the summer. Because the turbines are so tall and a thousand feet they will be very visible from the beach.

The top of a thousand foot tower can be seen at the distance of 37 miles. As an example, when you drive onto LBI on Route 72 on the causeway, look to the left and see Barnegat Light house eight miles away. The lighthouse is 170 feet tall. Imagine the lighthouse to be five times taller or a thousand feet. Imagine 200 of these giant lighthouses with rotating blades each as long as a football field eight to sixteen miles off the beach. You will see them all from the bridge before you get on the island. Then you have to ask yourself, do I really want to rent a house here. Families will not want to come to the beach and see big in your face rotating wind machines, they will go somewhere else for a vacation.

The turbines will be seen day and night. They will be illuminated at night for ships and aircraft. Atlantic Shores says they will ask the FAA if it's okay to install red aircraft warning lights on top of the towers that only go on when the aircraft are nearby. The sky near LBI is very busy with aircraft all day and night approaching departing New Jersey and New York airports. Do you really think the FAA will allow the red strobe lights to be turned off when it's dark?

Comment Number: BOEM-2024-0008-1190-0001
Commenter Type: Individual
Commenter: Jane Fasullo

Comment Excerpt Text:

I live on Long Island, we have been dealing with offshore views of shipping vessels constantly going by, they are not ten or 12 or 16 miles off the edge of our shores, they are within feet in some cases of our shores.

Comment Number: BOEM-2024-0008-1205-0003
Commenter Type: Advocacy Group
Commenter: Bob Stern
Organization: Save Long Beach Island Incorporated

Comment Excerpt Text:

You haven't considered the issue of the operation of the turbines in terms of the rotation of the blades, it's virtually impossible to look at that, so you end up with a shore going experience where people come to the shore and cannot look at the seascape. It seems to me that would be an unacceptable impact that would require rejection of the project.

A.3.25 Water Quality

Comment Number: BOEM-2024-0008-0148-0002
Commenter Type: Individual
Commenter: Tom Littwin

Comment Excerpt Text:

One serious environmental hazard to be considered is Bisphenol A and epoxy compounds which are two of the main components of turbine blades. These blades will wear and peel due to the harsh conditions at sea. The particles will flow up the food chain and inevitably will end up in our own bodies.

Comment Number: BOEM-2024-0008-0456-0002
Commenter Type: Individual
Commenter: Regina Alfonso

Comment Excerpt Text:

These wind turbines will end up knocked over in the ocean when a major storm occurs and leak all the fuel / oil and pollute the ocean.

Comment Number: BOEM-2024-0008-0483-0002
Commenter Type: Individual
Commenter: Trina Garrett

Comment Excerpt Text:

These monster machines will pump billions of gallons of waters into themselves to keep cool and spit the water back at 90 degrees back into our ocean

Comment Number: BOEM-2024-0008-0524-0004
Commenter Type: Individual
Commenter: Sharon Mahoney

Comment Excerpt Text:

I also read there are numerous oils and chemicals needed in order to operate these turbines. What happens when these chemicals leak into the ocean?
BOEM is responsible for environmental compliance with DEP regulations

Comment Number: BOEM-2024-0008-0524-0006
Commenter Type: Individual
Commenter: Sharon Mahoney

Comment Excerpt Text:

Show us the evidence. Show us the scientific analysis.
It has been noted in the Atlantic Shores documents, but certainly not highlighted, that these turbines contain hazardous chemicals such as lubricants, hydraulic oils and fuels. Each substation generation unit can contain up to 80,000 gallons of oil and 50,000 gallons of diesel fuel.

Comment Number: BOEM-2024-0008-0629-0001
Commenter Type: Individual
Commenter: Tom Cassella

Comment Excerpt Text:

As a life long New Jersey resident, born and raised in the Meadowlands and Passaic River; the clean environment was always on my mind. I didn't know why I couldn't swim in the river; I was told it was too polluted. What if one day I say, we can't swim in the ocean because it was polluted by unprecedented, outdated, technologically that was for seen and ignored because people want to make money at the cost of "trying to save the environment" but you are doing anything but. I think you know your hearts That you know this is not a good idea, but it sure is good money for the few. We will be gone soon by old age and our children will take over. Will you be proud of what you left them?

Comment Number: BOEM-2024-0008-0728-0002
Commenter Type: Individual
Commenter: Brian Thompson

Comment Excerpt Text:

To those who are concerned about the industrialization of our oceans I will note they already are. Cargo and passenger ships crisscross every ocean now, all the way to Antarctica spewing pollution with every mile traveled. A dump truck's worth of garbage enters the oceans every minute. Ocean water or water on its way to the ocean is used to cool nuclear reactors and fossil fuel plants, upsetting the balance of nature nearby.

Comment Number: BOEM-2024-0008-0862-0003
Commenter Type: Individual
Commenter: MARY SHAPPELL

Comment Excerpt Text:

Our children, grandchildren and those to come deserve a clean, clear ocean as it is now. STOP this insanity I pray.

Comment Number: BOEM-2024-0008-0900-0005
Commenter Type: Individual
Commenter: Roslyn McGivney

Comment Excerpt Text:

Wind turbines are likely to result in local and broader oceanographic effects and may disrupt the sense aggregations and distribution of zooplankton prey by altering the strength of tidal currents and associated fronts, changes in stratification, primary production, the degree of mixing and stratification- prediction in change of food chain supply. Ultimately, if you kill
One part of the food chain in the ocean's ecosystem, you kill the entire ocean.

Comment Number: BOEM-2024-0008-0953-0005
Commenter Type: Individual
Commenter: Kristina Parker

Comment Excerpt Text:

Many types of wind turbine require foundations which are placed deep into the seabed and the drilling of the ocean floor can destroy any marine habitats in the local area whilst also stirring up large amounts of sediment. This causes enormous clouds of sand and silt to hang in the water column until eventually settling down again. When the sediment comes back down to rest however, it can often smother corals, sponges and anemones which makes feeding, and simply surviving, a lot more challenging. Swirls of sediment can also block out sunlight meaning plants and algae on the seafloor struggle to photosynthesis and feed themselves.

Comment Number: BOEM-2024-0008-0964-0003
Commenter Type: Individual
Commenter: Sally Barbato

Comment Excerpt Text:

The amount of pollution due to the turbines leaking oils and lubricants as well as the massive amount of turbine related enormous boat traffic is hazardous to all species.

Comment Number: BOEM-2024-0008-0974-0005
Commenter Type: Anonymous
Commenter: Anonymous

Comment Excerpt Text:

The physical presence of multiple large wind turbines can potentially alter local currents, upwelling patterns, and sediment transport dynamics, which could impact nutrient cycling, larval dispersal, and coastline processes like erosion.

Comment Number: BOEM-2024-0008-1029-0005
Commenter Type: Individual
Commenter: Douglas Crawford

Comment Excerpt Text:

Wrecking of marine habitat through increasing water temperature: We expect all further analyses to

model increases in water temperature due to the blocking of normal water churning by the undersea installations.

Furthermore, for the farms further out, we understand that the HVDC cooling installations will intake 8 million gallons a day of cool seawater and output that water at temperatures exceeding 90F. The creatures living in the vicinity of these installations will not survive these temperature increases. The ripple effect on the chain of life will be devastating.

These behaviors contradict the assertion that offshore wind helps global climate issues. In fact, it appears that they will gravely exacerbate problems.

Comment Number: BOEM-2024-0008-1106-0041
Commenter Type: Federal Agency
Organization: National Oceanic and Atmospheric Administration

Comment Excerpt Text:

- Impacts to water quality through sediment disturbance or pollutant discharge;

Comment Number: BOEM-2024-0008-1108-0019
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

- EPA recommends that the EIS also include information to disclose the impacts of the cooling water withdrawal and discharge proposed for each offshore substation. This could consist of the following:
- An evaluation of potential impacts of the discharges on the marine environment consistent with determining whether the discharge will cause unreasonable degradation of the marine environment.
- An evaluation of potential impacts to aquatic organisms and the marine environment from impingement, entrainment, and discharge of heated and chlorinated effluent.

Comment Number: BOEM-2024-0008-1108-0020
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

Vessel Discharges
- Bilge water often includes oil, fuel, hydraulic fluid and other pollutants that are not permitted to be discharged into the ocean in any amount. EPA regulates discharges from certain nonrecreational vessels operating within the territorial seas through the Vessel General Permit. The US Coast Guard also has standards for vessels carrying ballast water within the waters of the US. (extending 12 nm from shore).

Comment Number: BOEM-2024-0008-1108-0021

Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

We recommend that the EIS include language that identifies both federal authorities regulating these discharges where applicable.
- We also note that the discharge of ballast water from foreign vessels could introduce non- native marine organisms into US coastal waters. The EIS should explain how vessel operations will prevent the discharge of pollutants from routine releases as well as potential releases of nonnative marine organisms through the discharge of ballast water originating from foreign ports--if such vessels will be used during the construction or maintenance of the Project. It would be helpful if the EIS describes how the Project will be consistent with state requirements related to vessel discharges.

Comment Number: BOEM-2024-0008-1153-0002
Commenter Type: Individual
Commenter: Penni Breitling

Comment Excerpt Text:

Also the New Jersey shore ocean water quality has been so clear for swimming the last ten years or so, I am afraid this will change because of the machines. The damage to the ocean floor, tourism and the oil and the chemicals used to maintain the machines as well as the boats and helicopter fuel to reach them for maintenance seems to negate some of the environmental benefits to me.

Comment Number: BOEM-2024-0008-1180-0001
Commenter Type: Individual
Commenter: Kathleen Harper

Comment Excerpt Text:

Let's let the people know what's going inside the turbine. There will be 187 gallons of grease, 40 gallons of hydraulic oil, 106 gallons of gear oil, 1,585 gallons of the electric fluid, 793 gallons of diesel fuel, 243 pounds of sulphur hexafluoride, 357 gallons of propylene glycol and there will be 48 gallons of ethylene glycerine. So, these things are not clean. They are not green and they are ending up in our ocean and it has been proven that they leak. You will see many videos if you go online of the turbines leaking oil onto the land. So this is going to end up in our ocean. It's going to destroy our ocean.

Comment Number: BOEM-2024-0008-1182-0003
Commenter Type: Individual
Commenter: Lisa Bonanno

Comment Excerpt Text:

As it moves, we move pipelines on land and underneath and also the oil drilling, the rigs and everything we have, we have explosions, we have spills, not just out on the waters but just with oil dripping from cars and going into the sea, that is an environmental impact of fossil fuels and we are not talking about that enough.

Comment Number: BOEM-2024-0008-1183-0003
Commenter Type: Individual
Commenter: John Breitling

Comment Excerpt Text:

The huge wind turbines in the ocean will leak pollution and oil and chemicals into the ocean. Once the turbines are in place, Atlantic Shores can demand more money for maintenance. Atlantic Shores can also go bankrupt and walk away from the project leaving the machines in the ocean.

Comment Number: BOEM-2024-0008-1190-0002
Commenter Type: Individual
Commenter: Jane Fasullo

Comment Excerpt Text:

We have had to deal with oil spills, we have had to deal with accidents of all sort from loading and unloading the fuel. An alternative that BOEM has to consider is offshore drilling.

We have definitely all of us in the United States heard about the damages that have been done by offshore drilling to the water especially when there is a lake but when there is not, there is always danger from leakage from the ships and the loading and unloading of the fuel onto them.

I have also done a significant amount of investigation into fracking which is a way of getting the natural gas. It is not a clean situation, people think of gas as clean and maybe it is, but those places from which the sources come are emitting methane, the number one greenhouse gas increase that we have, and just today there have been major reports in our news about the offshore coral bleaching throughout our seas. Coral supports so many life forms that, incredibly high numbers of life forms, that we ourselves need for food. This is not being taken into consideration when we say we don't want offshore wind.

Trust me, I don't want it, but I don't want fires burning fossil fuel oils. I don't want the pollution that comes from fossil fuel oils. I don't want to have to constantly worry if my house is going to explode because of a gas leak. In fact, I dealt with a gas leak in the service to our block for 15, 20 years before something was done because of a health situation.

A.3.26 Wetlands and Waters of the U.S.

Comment Number: BOEM-2024-0008-0564-0005
Commenter Type: Individual
Commenter: Jane Cagney

Comment Excerpt Text:

Don't destroy our last great natural resource! We have destroyed much of our land and our atmosphere already. Much of it is not repairable, such as millions of acres of rainforest, millions of acres of topsoil, millions of acres of grasslands, millions of rivers, millions of lakes. We can possibly repair our atmosphere but not be destroying something else.

Comment Number: BOEM-2024-0008-1108-0022
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

Wetland Impacts
- The COP includes a thorough discussion of existing wetlands, streams and other waters of the US that may potentially be affected by the infrastructure or activities associated with the Project. It appears that the Project as designed will largely avoid these types of impacts. We recommend a discussion in the EIS include the range of design/construction measures highlighted in the COP that can be implemented to avoid and minimize impacts of transmission cables as they transition to shore from the marine environment. This is particularly important given proximity to a number of important regions in the New Jersey Back Bays such as Barnegat Bay and Great Egg Harbor.

Comment Number: BOEM-2024-0008-1108-0023
Commenter Type: Federal Agency
Commenter: Mark Austin
Organization: Environmental Protection Agency Region 2

Comment Excerpt Text:

- In instances where fill is proposed or will otherwise impact wetlands or other waters of the US, the EIS should explain how the activity will comply with EPA's Clean Water Act regulations issued under Section 404 (b)(l), referred to as "EPA's 404 (b)(l) Guidelines." The EIS should include an evaluation of ways in which each alternative can be designed to avoid, or where unavoidable, minimize direct and indirect impacts to wetlands and other waters. The evaluation of direct and indirect impacts should fully consider both temporary and permanent impacts as well as future impacts from necessary upgrades or maintenance.
- Additionally, the evaluation of indirect impacts should include any clearing impacts for the proposed terrestrial construction activities resulting in a change, either permanent or temporary, of cover type within a wetland (e.g., converting a forested wetland to an emergent or scrub/shrub wetland). Construction related indirect impacts (such as increased traffic in an area as a result of onshore infrastructure), including water quality impacts and erosion or sedimentation impacts to wetlands or waterbodies should be analyzed.

A.3.27 General Support or Opposition

Many comments expressed general support or opposition for the Project. Some commenters provided comments of support or opposition without providing a justification. Other commenters referred to generic resource topics as a justification for their support or opposition. Table A-2 provides a list of submissions that contained statements of general support or opposition. Commenters are generally supportive of the proposed Project because they may reduce fossil fuel dependance, reduce climate change impacts, increase job opportunities and improve the local economy, increase resiliency in the electric grid, improve air quality, and/or or add habitat for marine fisheries. Commenters are generally opposed to the proposed Project because they may adversely affect the aesthetics of the ocean view, marine wildlife and habitat, bats, birds, water quality, recreation and tourism, property values, commercial fisheries, navigation, and the local economy. Commenters proposed moving the Project farther from shore, conducting long-term studies to assess potential ecosystem impacts, adjusting the

number and placement of turbines to reduce long-term impacts, or relocating the Project to another lease area.

Table A-2 List of Submissions Containing Statements of General Support or Opposition

Submission ID	Individual Name	Agency/Organization Name
BOEM-2024-0008-0002	jean publie	
BOEM-2024-0008-0003	Tom Famulary	
BOEM-2024-0008-0010	Arlene Mangin	
BOEM-2024-0008-0011	Sean Fales	
BOEM-2024-0008-0012	Christine Childs	
BOEM-2024-0008-0013	Claire Dalessio	
BOEM-2024-0008-0014	Joseph Gleeson	
BOEM-2024-0008-0015	Sue Liebross	
BOEM-2024-0008-0016	Alison Adams-Woodford	
BOEM-2024-0008-0017	Joan Fitzpatrick	
BOEM-2024-0008-0018	Pam Naprstek	
BOEM-2024-0008-0019	Terrence Thompson	
BOEM-2024-0008-0020	Kathleen Frenchu	
BOEM-2024-0008-0021	Janet Werfel	
BOEM-2024-0008-0023	Barry Trogu	
BOEM-2024-0008-0025	Anonymous	
BOEM-2024-0008-0026	Anonymous	
BOEM-2024-0008-0028	Anonymous	
BOEM-2024-0008-0030	Anonymous	
BOEM-2024-0008-0032	Raymond Valinoti	
BOEM-2024-0008-0034		Green Team First Congregational Church Montclair NJ
BOEM-2024-0008-0035	Eric Johnson	
BOEM-2024-0008-0037	Barbara Friedman	
BOEM-2024-0008-0040	Gregory Liano	
BOEM-2024-0008-0042	George Gehring	
BOEM-2024-0008-0043	James Guenther	
BOEM-2024-0008-0044	Matt King	
BOEM-2024-0008-0045	Michael Roulier	
BOEM-2024-0008-0046	Kathleen Harper	
BOEM-2024-0008-0047	Gary Frederick	
BOEM-2024-0008-0048	Ram Shah	
BOEM-2024-0008-0049	Sam Zappala	
BOEM-2024-0008-0050	Rajdeep Usgaonker	
BOEM-2024-0008-0051	Anonymous	
BOEM-2024-0008-0052	Stephen Knowlton	
BOEM-2024-0008-0054	Dr. ERIC Davis	

Submission ID	Individual Name	Agency/Organization Name
BOEM-2024-0008-0055	Raymond Valinoti	
BOEM-2024-0008-0060	Brian Boyle	
BOEM-2024-0008-0061	Anonymous	
BOEM-2024-0008-0063		NJ State Chamber of Commerce
BOEM-2024-0008-0064	Anonymous	
BOEM-2024-0008-0067	Mark Canright	
BOEM-2024-0008-0070	Maria Savettiere	
BOEM-2024-0008-0072	Robin McConekey	
BOEM-2024-0008-0073	BONNIE JONES	
BOEM-2024-0008-0074	Bob Van norman	
BOEM-2024-0008-0075	christine taylor	
BOEM-2024-0008-0076	Gina Masessa	
BOEM-2024-0008-0077	Anonymous	
BOEM-2024-0008-0078	John Nichols	
BOEM-2024-0008-0079	Eric Nussbaum	
BOEM-2024-0008-0082	Anonymous	
BOEM-2024-0008-0083	Anonymous	
BOEM-2024-0008-0086	Anonymous	
BOEM-2024-0008-0088	Anonymous	
BOEM-2024-0008-0089	Anonymous	
BOEM-2024-0008-0095	Anonymous	
BOEM-2024-0008-0109	Anonymous	
BOEM-2024-0008-0115	Silvia Murray	
BOEM-2024-0008-0116	James Dilks	
BOEM-2024-0008-0117	Lisa Bond	
BOEM-2024-0008-0118	Lisa Bond	
BOEM-2024-0008-0119	Sick Andtired	
BOEM-2024-0008-0120	Susan Swezeny	
BOEM-2024-0008-0122	Pamela Ryan	
BOEM-2024-0008-0123	James Monaco	
BOEM-2024-0008-0124		Southern NJ Development Council
BOEM-2024-0008-0127	Robin McConekey	
BOEM-2024-0008-0128	Robin McConekey	
BOEM-2024-0008-0129	Michael Szczesny	
BOEM-2024-0008-0130	Deb Gardiner	
BOEM-2024-0008-0131	Christine A	
BOEM-2024-0008-0132	John Reading	
BOEM-2024-0008-0133	Jeffrey Brooker	
BOEM-2024-0008-0134	Mary DellaValle	
BOEM-2024-0008-0136	Susan Kinsella	

Submission ID	Individual Name	Agency/Organization Name
BOEM-2024-0008-0137	Patricia Hilliard	
BOEM-2024-0008-0140	Anonymous	
BOEM-2024-0008-0145	Anne Price	
BOEM-2024-0008-0146	Judith Tyson	
BOEM-2024-0008-0151	Lorraine Hafner	
BOEM-2024-0008-0152	Peggy L	
BOEM-2024-0008-0153	wendy mccrann	
BOEM-2024-0008-0154	Sean Crimmins	
BOEM-2024-0008-0156	Ed Toland	
BOEM-2024-0008-0157	William Casey	
BOEM-2024-0008-0158	Kath Bizzarro	
BOEM-2024-0008-0159	Tom Jones	
BOEM-2024-0008-0172	Nadia Fay	
BOEM-2024-0008-0190	Mary Smith	
BOEM-2024-0008-0211	Verna Lindskoog	
BOEM-2024-0008-0249	Kelsey Lardiere	
BOEM-2024-0008-0256	Gayle Dadian	
BOEM-2024-0008-0259	Elissa Campanella	
BOEM-2024-0008-0361	Christine Christopoul	
BOEM-2024-0008-0364	susab keating	
BOEM-2024-0008-0410	Pamela Horovitz	
BOEM-2024-0008-0426	William Amann	
BOEM-2024-0008-0430	Anonymous	
BOEM-2024-0008-0445	Bethe Frazer	
BOEM-2024-0008-0446	Robert Van Norman	
BOEM-2024-0008-0448	Teresa Silletti	
BOEM-2024-0008-0449	lisa marie	
BOEM-2024-0008-0450	Katelynn Corcoran	
BOEM-2024-0008-0451	Louise Neal	
BOEM-2024-0008-0454	Tanya Wyant	
BOEM-2024-0008-0458	James McConekey	
BOEM-2024-0008-0459	Fran Friedrich	
BOEM-2024-0008-0460	Charles Kocher	
BOEM-2024-0008-0461	Luisa Conlin	
BOEM-2024-0008-0462	Penny Campbell	
BOEM-2024-0008-0463	A Coil	
BOEM-2024-0008-0465	Cheryl Light	
BOEM-2024-0008-0466	Robert Stohrer	
BOEM-2024-0008-0467	Ron Fenton	
BOEM-2024-0008-0469	Kathy Goffredi	

Submission ID	Individual Name	Agency/Organization Name
BOEM-2024-0008-0470	Susan Carril	
BOEM-2024-0008-0472	Jeff Gelnaw	
BOEM-2024-0008-0473	Mimi Glaspey	
BOEM-2024-0008-0474	Chris Esposito	
BOEM-2024-0008-0475	Tara Betsch	
BOEM-2024-0008-0476	Sally McCarty	
BOEM-2024-0008-0477	Angela McKeon	
BOEM-2024-0008-0478	Tina Kourakos	
BOEM-2024-0008-0479	Anthony Rimikis	
BOEM-2024-0008-0481	Anonymous	
BOEM-2024-0008-0484	Evelyn Cantelmo	
BOEM-2024-0008-0487	Martha Lodge	
BOEM-2024-0008-0495	Anonymous	
BOEM-2024-0008-0496	Jeanne Pappas	
BOEM-2024-0008-0497	joseph Magiera	
BOEM-2024-0008-0498	Anonymous	
BOEM-2024-0008-0501	Jeremy Blunt	
BOEM-2024-0008-0503	Donna Scharfetter	
BOEM-2024-0008-0504	Kevin Peterson	
BOEM-2024-0008-0505	Penny Campbell	
BOEM-2024-0008-0507	Anonymous	
BOEM-2024-0008-0508	Christina Kramer	
BOEM-2024-0008-0512	Mary Sweeney	
BOEM-2024-0008-0513	Deanna Stearns	
BOEM-2024-0008-0514	Susan Kinsella	
BOEM-2024-0008-0515	Kelley Butler	
BOEM-2024-0008-0518	Vickie Klawitter	
BOEM-2024-0008-0519	Gail DeRitis DeRitis	
BOEM-2024-0008-0520	Anonymous	
BOEM-2024-0008-0521	Anonymous	
BOEM-2024-0008-0522	Linda Labrutto	
BOEM-2024-0008-0523	Annette Mikalouskas	
BOEM-2024-0008-0528	Heather Riley	
BOEM-2024-0008-0529	Kathleen Harper	
BOEM-2024-0008-0531	Adrienne Tully	
BOEM-2024-0008-0532	Pam Callender	
BOEM-2024-0008-0533	Anita Pieri	
BOEM-2024-0008-0534	Anonymous	
BOEM-2024-0008-0535	Tina Craig	
BOEM-2024-0008-0536	Richard Sarnes	

Submission ID	Individual Name	Agency/Organization Name
BOEM-2024-0008-0537	Anonymous	
BOEM-2024-0008-0541	Anonymous	
BOEM-2024-0008-0542	Diane Mastrogiacomo	
BOEM-2024-0008-0543	Christina Romeo	
BOEM-2024-0008-0545	Tom Jones	
BOEM-2024-0008-0547	Anonymous	
BOEM-2024-0008-0548	Jill morrison	
BOEM-2024-0008-0552	Robin Vanderbilt	
BOEM-2024-0008-0553	Jamie Briggs	
BOEM-2024-0008-0554	Shawn Morton	
BOEM-2024-0008-0556	Carol Brinkmann	
BOEM-2024-0008-0561	Peg Welles	
BOEM-2024-0008-0563	Carrie Buchanan	
BOEM-2024-0008-0571	RobertRobert Duggan	
BOEM-2024-0008-0576	Anonymous	
BOEM-2024-0008-0577	Harry Harrison	
BOEM-2024-0008-0584	Nathalie Turner	
BOEM-2024-0008-0591	Ben S	
BOEM-2024-0008-0596	Joyce Wirpsza	
BOEM-2024-0008-0597	Craig Turner	
BOEM-2024-0008-0601	Nicole Viola	
BOEM-2024-0008-0602	John Reading	
BOEM-2024-0008-0605	Florissa Boublis	
BOEM-2024-0008-0606	Gail Sara	
BOEM-2024-0008-0608	Dan Freitag	
BOEM-2024-0008-0609	Anonymous	
BOEM-2024-0008-0610	Anonymous	
BOEM-2024-0008-0613	Laurie Tarter	
BOEM-2024-0008-0614	Elizabeth Terrel	
BOEM-2024-0008-0615	Richard Munkittrick	
BOEM-2024-0008-0616	Anonymous	
BOEM-2024-0008-0617	Joanne Cicala	
BOEM-2024-0008-0618	nick milonas	
BOEM-2024-0008-0619	Kathleen Harper	
BOEM-2024-0008-0621	Fernando Irizarry	
BOEM-2024-0008-0623	Anonymous	
BOEM-2024-0008-0626	Amy Jones	
BOEM-2024-0008-0628	Michael Gilchrist	
BOEM-2024-0008-0632	Glen Garvin	
BOEM-2024-0008-0634	Anonymous	

Submission ID	Individual Name	Agency/Organization Name
BOEM-2024-0008-0635	John Clarke	
BOEM-2024-0008-0636	Anonymous	
BOEM-2024-0008-0637	Anonymous	
BOEM-2024-0008-0638	Amy Shnider	
BOEM-2024-0008-0641	David Geer	
BOEM-2024-0008-0642	Anonymous	
BOEM-2024-0008-0643	Pamela Griesser	
BOEM-2024-0008-0649	BONNIE JONES	
BOEM-2024-0008-0652	Diane Snelson	
BOEM-2024-0008-0654	Justin Alpert	
BOEM-2024-0008-0657	Rahul Del	
BOEM-2024-0008-0661	Anonymous	
BOEM-2024-0008-0684	Kevin Doorley	
BOEM-2024-0008-0687	Lisa Bond	
BOEM-2024-0008-0715	Richard Suer	
BOEM-2024-0008-0731	Margaret Middaugh	
BOEM-2024-0008-0736	Roy Fischman	
BOEM-2024-0008-0742	T Kirckof	
BOEM-2024-0008-0749	Holly Marcello	
BOEM-2024-0008-0762	kathleen corsey	
BOEM-2024-0008-0788	Peter Clare	
BOEM-2024-0008-0796	John Garay	
BOEM-2024-0008-0828	Peter Trojano	
BOEM-2024-0008-0841	John Reilly	
BOEM-2024-0008-0842	Anonymous	
BOEM-2024-0008-0844	Edward Leo	
BOEM-2024-0008-0864	Thomas Vogel	
BOEM-2024-0008-0868	Anonymous	
BOEM-2024-0008-0869	Anonymous	
BOEM-2024-0008-0871	Annette Mikalouskas	
BOEM-2024-0008-0872	Melinda Decker	
BOEM-2024-0008-0873	Micchelle Gonzalez	
BOEM-2024-0008-0875	Leslie Long	
BOEM-2024-0008-0876	Dan Sikora	
BOEM-2024-0008-0877	Greg Golden	
BOEM-2024-0008-0878	ernest mellon	
BOEM-2024-0008-0880	Jeanette York	
BOEM-2024-0008-0882	Kathryn Sabatini	
BOEM-2024-0008-0883	Amy Shnider	
BOEM-2024-0008-0884	BONNIE JONES	

Submission ID	Individual Name	Agency/Organization Name
BOEM-2024-0008-0885	Anonymous	
BOEM-2024-0008-0886	Linda Labrutto	
BOEM-2024-0008-0887	Carolyn Collins	
BOEM-2024-0008-0889	Karen Larson	
BOEM-2024-0008-0890	Anonymous	
BOEM-2024-0008-0891	Michelle Bo	
BOEM-2024-0008-0892	Penny Campbell	
BOEM-2024-0008-0893	Caryn Byrnes	
BOEM-2024-0008-0894	McCarthy Joanne	
BOEM-2024-0008-0896	Martha Stearns	
BOEM-2024-0008-0897	Andrew Bonnafant	
BOEM-2024-0008-0898	Bernadette Monari	
BOEM-2024-0008-0899	Edward McCormick	
BOEM-2024-0008-0901	Donald Muckerheide	
BOEM-2024-0008-0902	David Foell	
BOEM-2024-0008-0905	Elizabeth Gallagher	
BOEM-2024-0008-0906	Anonymous	
BOEM-2024-0008-0907	James Kelly	
BOEM-2024-0008-0909	Robert Vanhorn	
BOEM-2024-0008-0912	Joanne Gifford	
BOEM-2024-0008-0913	Anonymous	
BOEM-2024-0008-0915	Anonymous	
BOEM-2024-0008-0916	Sue Franko	
BOEM-2024-0008-0917	Jennifer Guarino	
BOEM-2024-0008-0919	Barbara Wright	
BOEM-2024-0008-0920	Margaret Lebak	
BOEM-2024-0008-0923	Amy Keating	
BOEM-2024-0008-0925	Darrie Lynch	
BOEM-2024-0008-0926	Jeffrey Brooker	
BOEM-2024-0008-0927	Marie Tyler Wiley	
BOEM-2024-0008-0929	Kristin Rayfield	
BOEM-2024-0008-0931	William Wasilewski	
BOEM-2024-0008-0933	Dave Baldwin	
BOEM-2024-0008-0936	Mimi Glaspey	
BOEM-2024-0008-0941	Leslie Richardson	
BOEM-2024-0008-0942	Lynne Norman	
BOEM-2024-0008-0943	John Mcgough	
BOEM-2024-0008-0947	Harry Nicol	
BOEM-2024-0008-0949	Keri Farley	
BOEM-2024-0008-0955	Stephanie Hazelton	

Submission ID	Individual Name	Agency/Organization Name
BOEM-2024-0008-0956	Irene Murdza	
BOEM-2024-0008-0957	Anonymous	
BOEM-2024-0008-0958	Anonymous	
BOEM-2024-0008-0959	Tony Barbini	
BOEM-2024-0008-0960	Mary Lou Malone	
BOEM-2024-0008-0961	Charles Wilson	
BOEM-2024-0008-0963	Ashley Villari	
BOEM-2024-0008-0966	Peggy Evernham	
BOEM-2024-0008-0967	Robyn Federico	
BOEM-2024-0008-0968	David Moser	
BOEM-2024-0008-0972	Kennedy Kevin	
BOEM-2024-0008-0973	Anonymous	
BOEM-2024-0008-0975	Nick C	
BOEM-2024-0008-0976	Andy Kennedy	
BOEM-2024-0008-0978	Anonymous	
BOEM-2024-0008-0980	LoriAnn DeForest	
BOEM-2024-0008-0981	Anonymous	
BOEM-2024-0008-0983	Kathleen Sullivan	
BOEM-2024-0008-0986	Maria Johns	
BOEM-2024-0008-0991	Anonymous	
BOEM-2024-0008-0992	Anonymous	
BOEM-2024-0008-0993	Anonymous	
BOEM-2024-0008-0994	A Bell	
BOEM-2024-0008-0995	peter silletti	
BOEM-2024-0008-0997	Anonymous	
BOEM-2024-0008-0998	KEVIN KERNAN	
BOEM-2024-0008-1000	Carol Ward	
BOEM-2024-0008-1001	Vince Marasco	
BOEM-2024-0008-1002	Carol Ward	
BOEM-2024-0008-1005	Cheryl Wille	
BOEM-2024-0008-1006	Anonymous	
BOEM-2024-0008-1009	Mary Lyons-Kim	
BOEM-2024-0008-1011		Lake View Community Association
BOEM-2024-0008-1012	Lucy Smorto	
BOEM-2024-0008-1013	J L	
BOEM-2024-0008-1014	Karen Ironside	
BOEM-2024-0008-1015	Shelley Nugent	
BOEM-2024-0008-1016	Joan Wensel	
BOEM-2024-0008-1017	Patricia Bernson	
BOEM-2024-0008-1018	Anonymous	

Submission ID	Individual Name	Agency/Organization Name
BOEM-2024-0008-1019	Anonymous	
BOEM-2024-0008-1020	Linda Ciccarelli	
BOEM-2024-0008-1022	Tracey Anselmo	
BOEM-2024-0008-1023	Birdie Wiskitin	
BOEM-2024-0008-1024	Laurence Bernson	
BOEM-2024-0008-1026	Anonymous	
BOEM-2024-0008-1027	Jeri Yundi	
BOEM-2024-0008-1031	Carolyn Agresta	
BOEM-2024-0008-1035	Heidi DeCesare	
BOEM-2024-0008-1037	Beverly Neyenhouse	
BOEM-2024-0008-1042	Lorraine Duran	
BOEM-2024-0008-1045	Anonymous	
BOEM-2024-0008-1047	deborah mundy	
BOEM-2024-0008-1048	Eileen Feldgus	
BOEM-2024-0008-1049	Renee Henrich	
BOEM-2024-0008-1051	Elyse Horowitz	
BOEM-2024-0008-1052	Glen Grauer	
BOEM-2024-0008-1055	Anonymous	
BOEM-2024-0008-1062	Kim Finkle	
BOEM-2024-0008-1063	Ashley Donahue	
BOEM-2024-0008-1065	Darcy Baia-Cohen	
BOEM-2024-0008-1066	Anonymous	
BOEM-2024-0008-1067	Cortney Baldwin	
BOEM-2024-0008-1071	Donna Knepple	
BOEM-2024-0008-1072	Anonymous	
BOEM-2024-0008-1073	M E Kessler	
BOEM-2024-0008-1076	Carolyn Zomer	
BOEM-2024-0008-1079	Anonymous	
BOEM-2024-0008-1080	Carol M	
BOEM-2024-0008-1081	Whitney Stanbury	
BOEM-2024-0008-1084	Anonymous	
BOEM-2024-0008-1085	Anonymous	
BOEM-2024-0008-1086	MaryAnne Reinert	
BOEM-2024-0008-1087	Anonymous	
BOEM-2024-0008-1089	Gloria Stone	
BOEM-2024-0008-1091		New Jersey Environmental Lobby
BOEM-2024-0008-1093	Anonymous	
BOEM-2024-0008-1097	Chris Hewitt	
BOEM-2024-0008-1099	Joseph Kucay	
BOEM-2024-0008-1102	Kristian Hill	

Submission ID	Individual Name	Agency/Organization Name
BOEM-2024-0008-1107	Kevin Hartnett	
BOEM-2024-0008-1113	John E. Harmon, Sr.	African American Chamber of Commerce of New Jersey (AACCNJ)
BOEM-2024-0008-1114	Christina M. Renna	Chamber of Commerce Southern New Jersey
BOEM-2024-0008-1116	Meg Geer	Lavallette Environmental Cleanup Club
BOEM-2024-0008-1119	Richard Isaac	
BOEM-2024-0008-1121	Gina Zalewski	
BOEM-2024-0008-1123	Gregg Mele	Mele for America
BOEM-2024-0008-1128	Chris BAECKSTROM	
BOEM-2024-0008-1132	Dennis De Forest	
BOEM-2024-0008-1135	Eileen Feldgus	
BOEM-2024-0008-1141	Kathleen Sullivan	
BOEM-2024-0008-1142	Jennifer Serafin	
BOEM-2024-0008-1146	William Healy	New Jersey Alliance for Action
BOEM-2024-0008-1149	Jackie Greger	Sierra Club
BOEM-2024-0008-1151	Mike Jacobs	
BOEM-2024-0008-1152	Paulina O'Connor	New Jersey Offshore Wind Alliance
BOEM-2024-0008-1155	Peggy Middaugh	Unitarian Universalist Faith Action New Jersey
BOEM-2024-0008-1161	Anthony Marucci	
BOEM-2024-0008-1162	Carmella Marucci	
BOEM-2024-0008-1167	Chris Placitella	
BOEM-2024-0008-1171	Aviva Gans	
BOEM-2024-0008-1175	Brian Thomas	
BOEM-2024-0008-1176	Eric Nussbaum	
BOEM-2024-0008-1184	Richard Isaac	
BOEM-2024-0008-1185	Nicole Memmber	
BOEM-2024-0008-1187	Anjuli Ramos	Sierra Club
BOEM-2024-0008-1188	Laurie Maxwell	
BOEM-2024-0008-1192	Michael Jacobs	
BOEM-2024-0008-1194	Sheronda Allen	New Jersey Progressive Equitable Energy Coalition
BOEM-2024-0008-1201	Anthony Rose	Natural Resources Protective Association
BOEM-2024-0008-1204	Teresa Boyle--Vellucci	
BOEM-2024-0008-1207	Liz Treston	
BOEM-2024-0008-1208	Peggy Middaugh	

A.3.28 Submissions from Anonymous Commenters

BOEM received 91 submissions from anonymous commenters, excluding those submitting form letters. Table A-3 provides the Submission ID numbers associated with the anonymous submissions. Submissions from anonymous commenters were categorized by resource topic as applicable. Many were focused on general support or opposition and project relocation.

Table A-3 List of Submissions from Anonymous Commenters

Submission IDs
BOEM-2024-0008-0009
BOEM-2024-0008-0025
BOEM-2024-0008-0026
BOEM-2024-0008-0028
BOEM-2024-0008-0030
BOEM-2024-0008-0051
BOEM-2024-0008-0061
BOEM-2024-0008-0064
BOEM-2024-0008-0068
BOEM-2024-0008-0077
BOEM-2024-0008-0082
BOEM-2024-0008-0083
BOEM-2024-0008-0086
BOEM-2024-0008-0088
BOEM-2024-0008-0089
BOEM-2024-0008-0090
BOEM-2024-0008-0095
BOEM-2024-0008-0109
BOEM-2024-0008-0111
BOEM-2024-0008-0140
BOEM-2024-0008-0155
BOEM-2024-0008-0430
BOEM-2024-0008-0481
BOEM-2024-0008-0495
BOEM-2024-0008-0498
BOEM-2024-0008-0502
BOEM-2024-0008-0507
BOEM-2024-0008-0520
BOEM-2024-0008-0521
BOEM-2024-0008-0534
BOEM-2024-0008-0537
BOEM-2024-0008-0541
BOEM-2024-0008-0544
BOEM-2024-0008-0547
BOEM-2024-0008-0555

Submission IDs
BOEM-2024-0008-0572
BOEM-2024-0008-0576
BOEM-2024-0008-0581
BOEM-2024-0008-0599
BOEM-2024-0008-0609
BOEM-2024-0008-0610
BOEM-2024-0008-0616
BOEM-2024-0008-0623
BOEM-2024-0008-0634
BOEM-2024-0008-0636
BOEM-2024-0008-0637
BOEM-2024-0008-0642
BOEM-2024-0008-0646
BOEM-2024-0008-0661
BOEM-2024-0008-0780
BOEM-2024-0008-0789
BOEM-2024-0008-0800
BOEM-2024-0008-0842
BOEM-2024-0008-0859
BOEM-2024-0008-0868
BOEM-2024-0008-0869
BOEM-2024-0008-0885
BOEM-2024-0008-0890
BOEM-2024-0008-0906
BOEM-2024-0008-0913
BOEM-2024-0008-0915
BOEM-2024-0008-0921
BOEM-2024-0008-0930
BOEM-2024-0008-0939
BOEM-2024-0008-0951
BOEM-2024-0008-0957
BOEM-2024-0008-0958
BOEM-2024-0008-0965
BOEM-2024-0008-0973
BOEM-2024-0008-0974
BOEM-2024-0008-0978
BOEM-2024-0008-0981
BOEM-2024-0008-0991
BOEM-2024-0008-0992
BOEM-2024-0008-0993
BOEM-2024-0008-0997
BOEM-2024-0008-1006

Submission IDs
BOEM-2024-0008-1018
BOEM-2024-0008-1019
BOEM-2024-0008-1026
BOEM-2024-0008-1045
BOEM-2024-0008-1050
BOEM-2024-0008-1055
BOEM-2024-0008-1066
BOEM-2024-0008-1072
BOEM-2024-0008-1079
BOEM-2024-0008-1084
BOEM-2024-0008-1085
BOEM-2024-0008-1087
BOEM-2024-0008-1093
BOEM-2024-0008-1094